

Exhibit A



isis agora lovecraft
@isislovecraft

anarchist; hacker; once-upon-a-time
theoretical physicist. I might be a
cryptographer but I'm not your
cryptographer. made 翻墙软件. آزادی بیان
they/them

San Francisco, CA
patternsinthevoid.net
Joined December 2010

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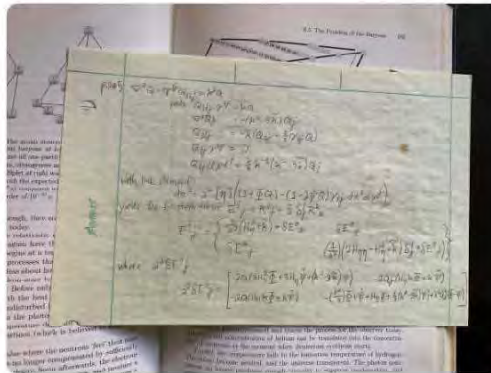
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isis agora lovecraft @isislovecraft · 22 Mar 2014

$$x = \text{"if(t\%2)\text{"python3 -c\"[print(t>>15\&(t>>25x4))\%(3+(t>>(85x11))\%4)+} \\ (t>>10)]42\&t>>7\&t<<9,\text{"end="\"for t in range(2**20)]\"[laplay -c2 -r4} \\$$
 35 189 519

isis agora lovecraft @isislovecraft · Apr 30
 found some of my notes earlier from when most of the maths i did was stuff like
 calculating the influence of zero-point fluctuations on the cosmic microwave
 background and the effects thereof on large scale structure formation in the
 opaque universe and it bought back ~feelings~



8 7 125

isis agora lovecraft @isislovecraft · Apr 30
 the pupper was previously being such a good lil fluffer



merlin the irish wolfhound pupper @realwolfpuppy
 today, im helps my humin. wif the crypto paprs. by doin
 sleps. undrr desk.
[Show this thread](#)

1 1 17

[Show this thread](#)

isis agora lovecraft @isislovecraft · Apr 30
 please nobody steal my half baked ideas, but if you understand both quaternions
 and lattice-based post-quantum crypto and want to work on it with me hmu 🌟

8 1 24

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isis agora lovecraft @isislovecraft · Apr 30
 jic the cryptographer who wrote that paper sees: yes i understood the window
 selection size in lattice vector reconciliation is tied to the number of redundancy
 bits in the error correcting code.. i was planning to explore rewriting the
 reconciliation to use quaternion rotations

2 21

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isis agora lovecraft @isislovecraft · Apr 30
 "my dog ate my error correcting code optimisations"



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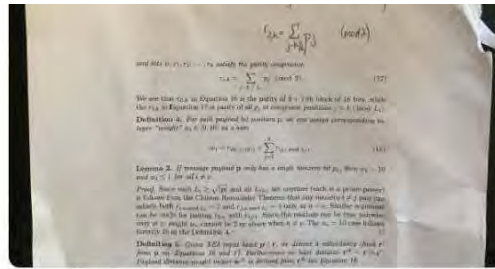
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- aloria** @aloria
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1,961 Tweets
- House Speaker Nancy Pelosi**
2,720 Tweets
- #NationalDayOfPrayer**
30.9K Tweets
- #ThursdayThoughts**
81.3K Tweets
- Danny Ainge**
4,404 Tweets
- #ThursdayMotivation**
34K Tweets
- #ChickenBarr**
Congressman Steve Cohen shades AG William Barr following a no-show at hearing
- #MuellerGate**
68.1K Tweets
- Star Wars Land**
- #BDG2019**

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3 8 106

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isis agora lovecraft @isislovecraft · Apr 28

you: don't you think it's weird you have a dog that's twice your size and wants to eat wolves

me: "walks past a café in san francisco with a dude sitting down outside with an albino macaw on his shoulder who is alternating between squawking "BITCOIN" and eating biscotti"

me: no.

5 25 248

isis agora lovecraft Retweeted



Zhuowei Zhang @zhuowei · Apr 28

Integer instructions: 200 bytes
Load/store instructions: 150 bytes
Branch instructions: 800 bytes
NOP instructions: 3,600 bytes
Floating point instructions: 150 bytes

someone who is good at delay slots please help me optimize this, my processor architecture is dying

8 48 191



isis agora lovecraft @isislovecraft · Apr 28

this game is awesome, i just took out like eight dudes with a suppressed submachine gun while riding a flying skateboard and then i built a tree house to snipe some more dudes

7 141

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isis agora lovecraft @isislovecraft · Apr 28

anyway guess who got inspired to finally try fortnite



3 207

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isis agora lovecraft @isislovecraft · Apr 28

me: oops sorry for using a bad word

kid: dude i'm 12 i already know all the bad words

me: what do you like to hack on

kid: mostly i just do fortnite hacks but i'm learning metasploit

me: that's badass, you're the coolest kid ever

me: shit i did it again

kid: dude don't worry

10 6 207

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isis agora lovecraft @isislovecraft · Apr 28

me, walking @realwolfpuppy:

kid on the street: woah your dog is HUGE

me: still a puppy

kid: hey wait aren't you that famous hacker

me: what.

kid: i follow you on twitter

me: what.

kid: i wanted to follow other hackers

me: you're a hacker? that's fucking awesome

13 33 661

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isis agora lovecraft @isislovecraft · Apr 26



boomers: only ~10% gay
 gen Xers: "nobody cared enough to do a study"
 millennials: double the gay
 gen Zers: more than 50% gay

let's keep this trend going people, i want generation α 100% gay and doing crimes

suddenly, ubiquitous. A 2017 study by the advocacy group GLAAD found that millennials were more than twice as likely as baby boomers to identify as LGBTQ, but less likely than older LGBTQ generations to use the words "gay" or "lesbian" to describe themselves, leading the group to conclude that "millennials appear more likely to identify in terminology that falls outside those previously traditional binaries."

That survey didn't even include Generation Z, which is shaping up to be queerer and more gender diverse than millennials. A 2016 report from the J. Walter Thompson Innovation Group found that more than half of Gen Z-ers said they know someone who uses gender-neutral pronouns such as "they" or "ze," and less than half of the group said they identified as "exclusively heterosexual."

20 140 453



isis agora lovecraft @isislovecraft · Apr 25

oh wait. i bet i know who did this. vinegar bean smoothie startup dude.

Sarah Gailey @gaileyfey

Who wants to hear a story of the Worst Party Guest Ever? I hope you do because this is happening

4 3 51

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isis agora lovecraft @isislovecraft · Apr 25

help i thought i was getting a nice lemongrassy minty cool snack but goddamn hippies snuck balsamic vinegar AND coconut water in there AT THE SAME TIME ffs who does this

8 3 77

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isis agora lovecraft @isislovecraft · Apr 25

i have made a grave error and managed to buy the most portland beverage of all time



19 14 136

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isis agora lovecraft @isislovecraft · Apr 25

i feel like if i'm rereading a paper and my margin notes from four years ago were like

LOL NOT ACTUALLY ANONYMOUS

lol hash n pray

that's.. not the curve order

narrator: not actually a uniform distribution

and now i'm finding more things to laugh at it's not a good sign

1 8 58



isis agora lovecraft @isislovecraft · Apr 24

jumping through proxies like



2 14 58

isis agora lovecraft @isislovecraft · Apr 24
i finally did it. i have officially discovered The Worst Subreddit

32 25 241

isis agora lovecraft Retweeted

Chelsea E. Manning @xychelsea · Apr 22
** Today, the 4th Circuit Court of Appeals ruled to keep Chelsea in jail. "I don't have anything to contribute to this, or any other grand jury ... I will not give up," she says.

Full statement from Chelsea and her attorneys: sparrowmedia.net/2019/04/chelsea

"While disappointing, we can still raise issues as the government continues to abuse the grand jury process. I don't have anything to contribute to this, or any other grand jury. While I miss home, they can continue to hold me in jail, with all the harmful consequences that brings. I will not give up. Thank you all so very much for your love and solidarity through letters and contributions."

Chelsea Manning

195 2.0K 3.7K

isis agora lovecraft Retweeted

Nicole Aptekar @nicoles · Apr 22
No quarrel between the ink and the sun.

Years of work finally paying off into this new process. It's a struggle to make, but hopefully y'all agree it's worth it.

[instagram.com/nicole.aptekar](https://www.instagram.com/nicole.aptekar)

26 22 152

isis agora lovecraft @isislovecraft · Apr 22
PSA the service we were using to automate slack invites for the dalek cryptography slack has been broken for about a week due to an expired TLS cert so if you need an invite to dalek-cryptography.slack.com please just ask me

3 6 13

isis agora lovecraft @isislovecraft · Apr 22
i'm world's no. 1 at computing

1 5 43

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isis agora lovecraft @isislovecraft · Apr 22
hello twitter it's my first day working for a new plant and while getting set up

FROM: WHICH IS A BIT OF A PUN. I WAS TRYING TO GET A NEW CHAIR AND WHILE GETTING SET UP WITH THEIR SLACK I MANAGED TO ACCIDENTALLY DOUBLE CLICK ON A FILE NAMED 3am.jpg AND BRIEFLY SET MY PROFILE PIC TO THIS SO ANYWAY HOW'S YOUR MONDAY MORNING GOING



8 7 172

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sarah jeong @sarahjeong · Apr 21

imagine spending your entire career claiming chaos is feminine and then meeting slavoj zizek

42 1.5K 8.9K



isis agora lovecraft @isislovecraft · Apr 21

every time i ask @realwolfpup if some piece of their dragon lair of bones and furs sparks joy the answer is YES. for five minutes. and then it goes back onto the piles of bones

attacus @attacus_au

things I have learned while trying to cull greyhound toys:
"does this spark joy?" is not an effective question to ask a dog

6 25

isis agora lovecraft Retweeted



Kumars Salehi @KumarsSalehi · Apr 19

Zizek [tugs at shirt]: now I am going to say something horrible. I know it is fashionable to be critical of racism and sexism and so on

Peterson [dumbfounded]: what about Marx eh

Zizek [snorts]: on the contrary, to be a communist today means to return to Hegel. and racist jokes

13 214 2.1K



isis agora lovecraft @isislovecraft · Apr 19

just pulled out my phone during an interview with \$LARGE_TECH_COMPANY to show pictures of @realwolfpup and i unwittingly unlocked my phone to this meme @nicoles sent me

yes sirree i am definitely an extremely 100% serious cryptographer 24/7 definitely no queer shenanigans here



5 4 142

isis agora lovecraft Retweeted



ReductRs @reduct_rs · Apr 18

Find Someone That Looks at You the Way gcc Looks at Pointer Arithmetic

5 75 294



isis agora lovecraft @isislovecraft · Apr 19


 we won 1st place so i got a giant teacup and a chance to put bunny ears on @cooperq in a tiger suit thanks to my awesome teammates @teachrdan @dfko_0 @acbold @umudkip @marcidy @mij559



EFF @EFF


Congratulations to the winners of #EFFTechTrivia! After a tough tie breaker, the winners are...
In 3rd place, "Unredacted!"
In 2nd place, "ROT13"...

2 2 49


 **isis agora lovecraft** @isislovecraft · Apr 18
at the @EFF trivia night at Public Works

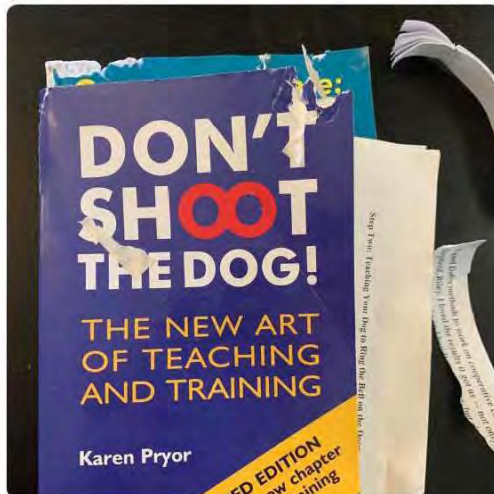


2 1 35

 **isis agora lovecraft** @isislovecraft · Apr 18
i've been cautiously asked if my pronouns are he/him three times this week including over the phone so i must be doing something right i guess

3 1 47

 **isis agora lovecraft** @isislovecraft · Apr 18
oh for fuck's sake



6 2 23

 **isis agora lovecraft** @isislovecraft · Apr 18
(this tweet brought to you by the really cute girl in a sequin crop top tank and salmon hotpants who just rode past me on a bicycle with a basket covered in fake flowers,, causing me to entirely forget what i was doing for at least a solid five minutes)

2 5 99

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
 **isis agora lovecraft** @isislovecraft · Apr 18
why can't every girl just be gay already, come on

13 16 147

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 **isis agora lovecraft** Retweeted
 **wintger overflow** @drilrs · Apr 16
if someone reads your code, thats it, youre basically fucked

23 580 2.6K

 **isis agora lovecraft** Retweeted

kara @KiraArghy · Apr 17
Note to self: Sending a payment to your girlfriend with the reference "Be gay, do crimes" will get flagged by your bank's fraud department **

75 568 4.4K

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isis agora lovecraft @isislovecraft · Apr 16
curve25519-elisabeth now contains a Java implementation of our Ristretto prime-order group thanks to @st4d! 🚀🔥 [github.com/cryptography-c...](https://github.com/cryptography-curve25519-elisabeth)

```

//
// * Construct a RistrettoElement from a uniformly-distributed 64-byte string.
// * -ga-
// * This is the ristretto10255 FROM_UNIFORM_BYTES function.
//
// * Returns the resulting element.
//
public static RistrettoElement fromUniformBytes(final byte[] b) {
    // 1. Interpret the low 256 bits of b[0..32] as an integer r0 in
    // little-endian representation. Reduce r0 modulo p.
    final byte[] b0 = Arrays.copyOfRange(b, 0, 32);
    final FieldElement r0 = FieldElement.fromByteArray(b0);

    // 2. Interpret the low 256 bits of b[32..64] as an integer r1 in
    // little-endian representation. Reduce r1 modulo d.
    final byte[] b1 = Arrays.copyOfRange(b, 32, 64);
    final FieldElement r1 = FieldElement.fromByteArray(b1);

    // 3. Compute group element P1 as R0/r1.
    final RistrettoElement P1 = RistrettoElement.map(r0);

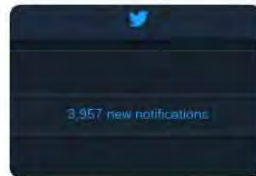
    // 4. Compute group element P2 as R1/r1.
    final RistrettoElement P2 = RistrettoElement.map(r1);

    // 5. Return the group element P1 + P2.
    return P1.add(P2);
}

```

3 7 50

isis agora lovecraft @isislovecraft · Apr 15
hell site



5 34

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tefco value programmer @tefco_ebooks · Apr 15

Replying to @isislovecraft

tired: mxstress

wired: mmxstress

1 1 13

isis agora lovecraft Retweeted
isis agora lovecraft @isislovecraft · Apr 14

Replying to @mjg59

VPMULDQ me daddy

2 2 16

isis agora lovecraft @isislovecraft · Apr 14

him: i will vectorise you

me: oh no

him: i will go fully SIMD

me: ...

him: and then go much slower as a result

1 2 18

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isis agora lovecraft @isislovecraft · Apr 14

vectorise me daddy

12 8 71

isis agora lovecraft @isislovecraft · Apr 14

every further word in this sentence made me gag a little harder

A Russian company called StartRocket says it's going to launch a cluster of cubesats into space that will act as an "orbital billboard," projecting enormous advertisements into the night sky like artificial constellations. And its first client, it says, will be PepsiCo — which will use the system to promote a "campaign against stereotypes and unjustified prejudices

against gamers” on behalf of an energy drink called Adrenaline Rush.

163 1.1K 3.6K



isis agora lovecraft @isislovecraft · Apr 13
WE'VE FOUND HACKERMAN

Goad Gatsby @GoadGatsby

Replying to @isislovecraft

thanks, this was my best work

1 2 19



isis agora lovecraft @isislovecraft · Apr 13
I never realised when Julian claimed he was “the third best hacker” and ed snowden was “ninth” that he was actually just backing up hackerman



2 8 67

isis agora lovecraft Retweeted



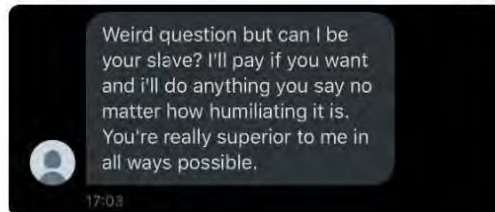
Hacker Fantastic @hackerfantastic · Apr 13
Hackers (1995) alternative ending (directors cut).



44 979 2.6K



isis agora lovecraft @isislovecraft · Apr 12
hell site



11 45

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isis agora lovecraft @isislovecraft · Apr 12
tfw you buy your pet dragon a queen size futon from ikea



merlin the Irish wolfhound pupper @realwolfpuppy
yuo thought yuo adopt wolf puppr. haha no. im smol dragon an this mmy lairr

1 3 29



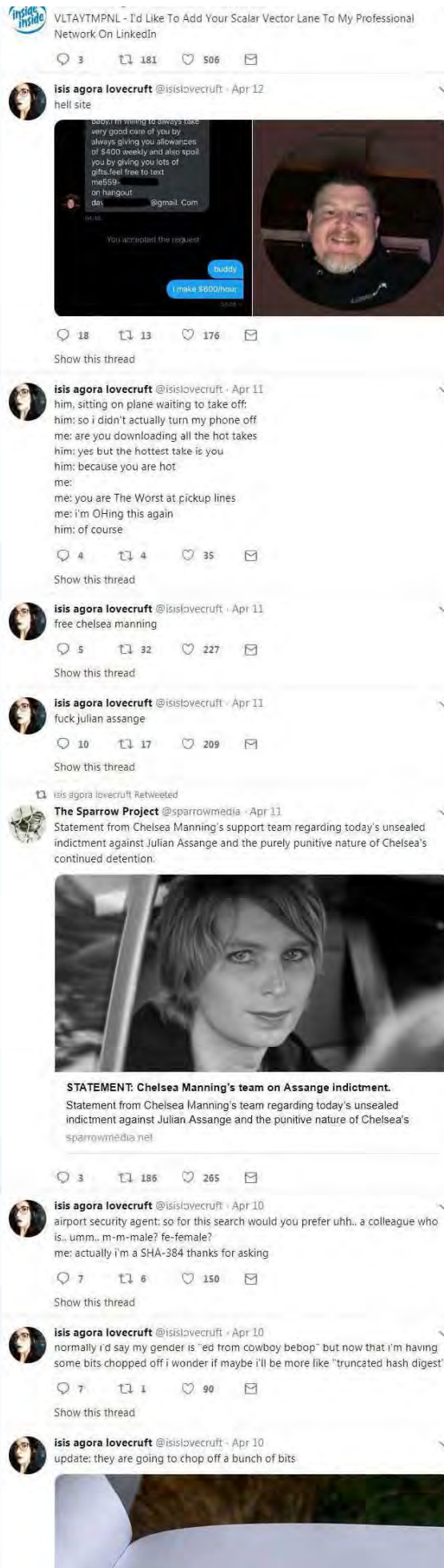
isis agora lovecraft @isislovecraft · Apr 12
sincerely throwing a “hooray the haggardly transmisogynistic rapist who can neither hack his way out of a wet paper bag nor do a journalism to save his life finally fucking got kicked out of that embassy” schadenfreude party this weekend

11 10 220

isis agora lovecraft Retweeted



Instructions @x86instructions · 8 Nov 2018



Instructions from Nazaneen Homaifar, MD**Preparing for Surgery at UCSF**

Your surgeon has recommended that you have an operation. The by-step through the process and to answer some frequently asked

When am I having surgery and where do I go?

Your surgeon's office will provide you with the location, date, and surgeon's office and want to check on the status of your upcoming speak with his/her practice assistant.

Will I meet my anesthesiologist before surgery?

You will not meet the anesthesiologist assigned to take care of you

33 1 159

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isis agora lovecraft @isislovecraft · Apr 10

status: wearing a binder, an oversized flannel, and no makeup, and pitching my voice as low as it'll go, so that i can look trans and gay enough in front of the surgeons so that they finally give me the surgeries i've been asking for since *checks watch* puberty

wish me luck

28 3 339

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isis agora lovecraft @isislovecraft · 24 Nov 2016

Replying to @isislovecraft

I am really fantastically bad at following the advice of wizards.

1 1 24

isis agora lovecraft Retweeted



isis agora lovecraft @isislovecraft · 24 Nov 2016

My dear old friend, The Pink Wizard of Kansas City, once told me that "kindness is the subtlest form of black magick."

1 7 54

isis agora lovecraft Retweeted



puppy..... 2!! @pup_hime · Apr 6

apparently theres a variation of mori girl fashion called dark mori and it literally what an actual witch would wear



620 13K 46K

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isis agora lovecraft @isislovecraft · Apr 6

good morning twitter i had a nightmare that some snivelling jerk off looking dude sat down next to me and excitedly said "have you heard the good news? julian assange is leading the ICO for the latest best alt coin!!" so i threw my glass of water in his face and walked away

9 12 159

isis agora lovecraft Retweeted



Filippo Valsorda @FiloSottile · Apr 2

To prove that crypto code can be understandable, I gave my best shot at writing a readable Poly1305 implementation. It tries to explain both what it's doing and how. (It's also 75% faster than the current one.)

```
// Multiplication of big number limbs is similar to elementary school
// columnar multiplication. Instead of digits, there are 64-bit limbs.
// We are multiplying a 3 limbs number, m, by a 2 limbs number, r.
//
//      h2  h1  h0  *
//      r1  r0  =
//      -----
//      h2r0 h1r0 h0r0  ← individual 128-bit products
//      * h2r1 h1r1 h0r1
//      -----
//      m3 m2 m1 m0  ← result in 128-bit overlapping limbs
//      * m3.h1 m2.h1 m1.h1 m0.h1
//      * m3.lo m2.lo m1.lo m0.lo  ← carry propagation
//      -----
//      t4 t3 t2 t1 t0  ← final result in 64-bit limbs
//
// The main difference from pen-and-paper multiplication is that we do
// carry propagation in a separate step, as if we wrote two digit sums
// at first (the 128-bit limbs), and then carried the tens all at once.
```

A Go implementation of Poly1305 that makes sense

Cryptography code could be understandable if only we commented it. I his Poly1305 implementation is an attempt to prove it. It should be readable wi...
blog.filippo.io

11 219 567

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isis agora lovecraft @isislovecraft · Apr 4

me, reading someone else's crypto code: 😊

code:

```
#define write51full(n,shift) f=((t[n]>>shift)|(t[n+1]<<(51-  
shift)));for(i=0;i<8;i++,f>=>8)*out+++=(unsigned char)f;  
#define write51(n) write51full(n,13*n)  
me: 🤖🤖🤖
```

7 5 70

isis agora lovecraft Retweeted



J Haigh @DebugSteven · Apr 3

After a year of reporting & handling reports, I wrote up a piece about how I'd like sexual assault to be handled in our professional communities.



Moderating Sexual Assault

How community organizers might handle sexual assault reports

optimisticatypes.com

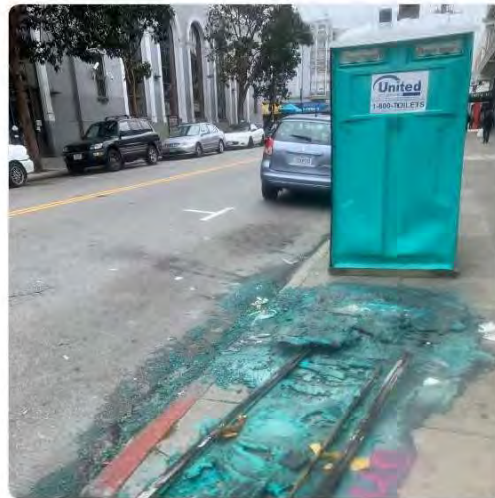
4 27 44

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isis agora lovecraft @isislovecraft · Apr 3

just in case anyone wanted to know what it looks like when someone bombs a porta potty

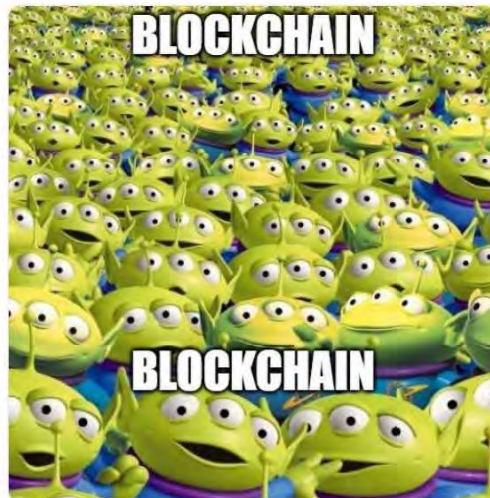


16 18 91



isis agora lovecraft @isislovecraft · Apr 3

i just opened my phone to a signal message from @gloupin with this image and i literally screamed and dropped my phone so now i need all of you to feel this pain



7 27 142

isis agora lovecraft Retweeted



Kate Compton @GalaxyKate · Apr 2

Gender reveal parties are a security risk.

Only ever reveal the hash of your baby's gender.

24 806 3.2K

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isis agora lovecraft @isislovecraft · Apr 2

is it just me being goth and colourblind or did twitter dark mode suddenly get darker

4 3 25



isis agora lovecraft @isislovecraft · Apr 2

GUESS WHO FORGOT THE CABLE ACTUALLY NEEDS TO BE 100' AAAAGDFDHGFD

fuck

7 3 37

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isis agora lovecraft @isislovecraft · Apr 2

how could i be mad at this cute lil fluffer



merlin the irish wolfhound pupper @rcalwolfpuppy
shark cuddles awooo

6 41

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isis agora lovecraft @isislovecraft · Apr 2

brb eating breakfast in the office because there's no internet in the kitchen while furiously googling for "kev ar shielded Cat6 RJ45 cable"

9 4 56

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isis agora lovecraft @isislovecraft · Apr 2

guess who just prime now'd a 50' ethernet cable because their dog ate the one connecting the main router to the wifi repeater on the other side of the house and so they woke up wondering why everything connected to the internet on one side of the house didn't work

this kid

22 4 116

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isis agora lovecraft @isislovecraft · Mar 31

him: did you know your heart has an vuln and i'm exploiting it
me: this is The Worst pickup line
me: i'm going to OH this
him: but everyone will know about the vuln
me: sure ok but you might have privileged access

9 22 145

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isis agora lovecraft @isislovecraft · Mar 28

normal person:
me, a san franciscan: WHY IS ROCK SALT FALLING FROM THE SKY WTF IS HAPPENING WHO IS THROWING ROCK SALT AT MY HOUSE



11 8 132



isis agora lovecraft @isislovecraft · Mar 28

holy crap do people really want iett@en.ciph.re to help them cash million dollar cheques

3 3 11



isis agora lovecraft @isislovecraft · Mar 27

OH GOD DAMMIT NOT AGAIN



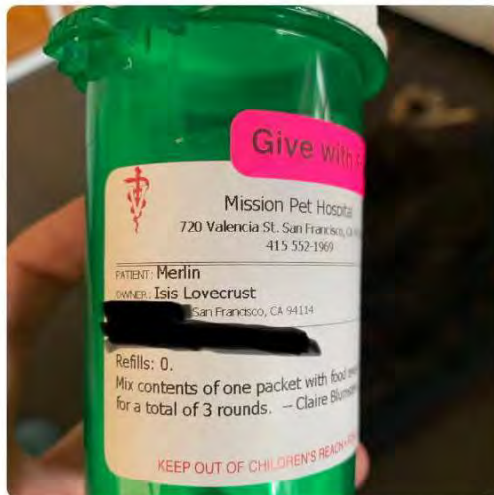
11 4 56

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isis agora lovecraft @isislovecraft · Mar 26

it did not occur to me that my name could be misheard this way over the phone



13 5 170



isis agora lovecraft @isislovecraft · Mar 26

i feel triple called out by this vodka?



5 30

Exhibit B

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Search Twitter



Tweet

Tweets
171Following
47Followers
370Likes
4

Follow


**merlin the irish
wolfhound pupper**

@realwolfpuppy

henlo im giant but seveenn month old
wolfhound pupper. @isislovecraft is my
humin. come frr mlems an stay for
aawwoooos. they/them

san francisco

Joined January 2019

Born September 03

[Tweet to merlin the irish wolfo...](#)

81 Photos and videos



Tweets

Tweets & replies

Media



Pinned Tweet

merlin the irish wolfhound pupper @realwolfpuppy · Jan 7
bartendr: srry but no puppers
me: awoo
bartendr: oh srry we did not realise you are baby horse sir
me:



2 1 45



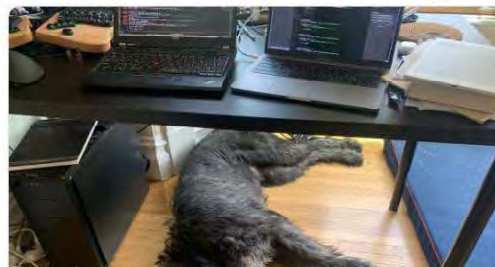
merlin the irish wolfhound pupper @realwolfpuppy · Apr 30
humin doin it wrroong. yuo supposde put yuo feets undrr me. no movin chairs
insteada. i biggerr than yuo. so im gets make the rules ok.



15

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merlin the irish wolfhound pupper @realwolfpuppy · Apr 30
today. im helps my humin. wif the crypto paprrs. by doin sleps. undrr desk.



Who to follow · Refresh · View all



Simon Crosby @simoncro...

Follow



Henry de Valence @hdeva...

Follow



Who ordered "that"? @M...

Follow

Find people you know

Trends for you · Change

#GalaxysEdge

1,961 Tweets

House Speaker Nancy Pelosi

2,773 Tweets

#NationalDayOfPrayer

31.8K Tweets

#ThursdayThoughts

82K Tweets

Danny Ainge

4,886 Tweets

#ChickenBarr

Congressman Steve Cohen shades AG William Barr following a no-show at hearing

#ThursdayMotivation

34.3K Tweets

Star Wars Land

#MuellerGate

68.1K Tweets

#NeedyIn5WordsOrLess

1,450 Tweets

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1 37

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merlin the irish wolfhound pupper @realwolfpuppy · Apr 29
an also im have biggest smile



16

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Apr 29
im always had bestest mlem game



2 12

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Apr 29
do any of yuo needs pupperr pics. in case yuo is havin bad day. this me whjen i was onmly two months old. im so littll



2 1 34

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Apr 28

i made a fren. she make vrry weird snorrtng nmoises. but her bandana. it match my bowtie. so i frgrive snorrtng



2 2 38



merlin the irish wolfhound pupper @realwolfpuppy · Apr 27

henlo fren. my plan frr satrday is nap. all day. what yuo doin



3 1 23



merlin the irish wolfhound pupper @realwolfpuppy · Apr 26

today im helps my humin. wif doin crypto paper rreviews. by takin up whole cowch. an dump blanktes on floorr. im gets journal aknowledgdment too ok



1 21

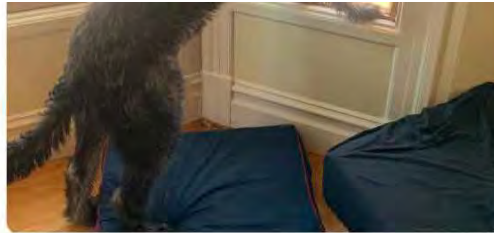


merlin the irish wolfhound pupper @realwolfpuppy · Apr 25

humin got me new bowtie. old bowtie saw too many sunshines an forest. now im cutests pupper again.







10



merlin the irish wolfhound pupper @realwolfpuppy · Apr 17

im bein good pupper. an waitin fr doctorr. an i met great dane doggo. but i bigger. so confusin



19



merlin the irish wolfhound pupper @realwolfpuppy · Apr 12

yuo thought yuo adopt wolf puppr. haha no. im smol drragon an this mmy lairrr



1 1 32



merlin the irish wolfhound pupper @realwolfpuppy · Apr 8

sharrk fren keeps shrrinking. it so confusin. send helps



1 1 17

merlin the irish wolfhound pupper Retweeted



merlin the irish wolfhound pupper @realwolfpuppy · Apr 2

Replying to @6ftSebas
fuck yuo

1 3 17



merlin the irish wolfhound pupper @realwolfpuppy · Apr 2

bork bork bark bork bark bork hrrmph

1 4

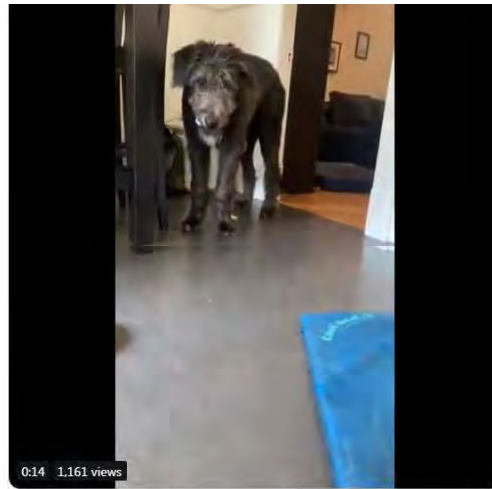
Tech Dogs @techdogbot

We put kubernetes on an Irish Wolfhound and people are obsessed with it.



merlin the irish wolfhound pupper @realwolfpuppy · Apr 2

humin giv me weird smell watrr. but they no giv warning abuot nose sparkles.
2/10 worst humin food i evrr tried



1 1 26

merlin the irish wolfhound pupper @realwolfpuppy · Apr 2
shark cuddles awooo



1 1 31

merlin the irish wolfhound pupper @realwolfpuppy · Mar 31
im big enuf use people fountains mnow



1 1 24

merlin the irish wolfhound pupper @realwolfpuppy · Mar 27
im makin nice salad for yuo awooo





0:12 430 views



merlin the irish wolfhound pupper @realwolfpuppy · Mar 27

there is pidgins. an they arre huddlin. in the rain. im nice an drry. inside wif my humin. haha suck to be yuo pidgins



16



merlin the irish wolfhound pupper @realwolfpuppy · Mar 26

henlo humin. im need yuo. get bigger cowch. thanks yuo



1 1 20



merlin the irish wolfhound pupper @realwolfpuppy · Mar 23

im grow big enuf. to aet ugly salesfrce towrr. then we see who rreally tallest in san frncisco



22



isis agora lovecraft @isislovecraft · Mar 21

so i just realised that if i wear a bunny mask and put an elliptic curve on @realwolfpuppy's head we can cosplay chiara bautista's bunnygirl and starwolf characters together





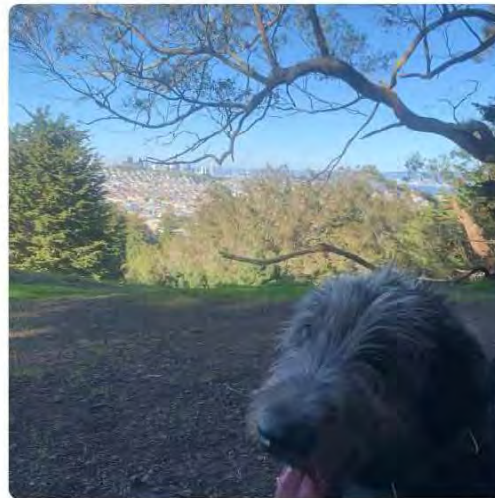
3 4 51

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Mar 21

hi guess whwat, im weigh morre than my humin now. that means im get to be the boss now. srry i dont maek the rrules



12



merlin the irish wolfhound pupper @realwolfpuppy · Mar 21

im learning wait. is so hard. how about we only learn fun tricks. frm now on. im only do fistbump fr the treats ok

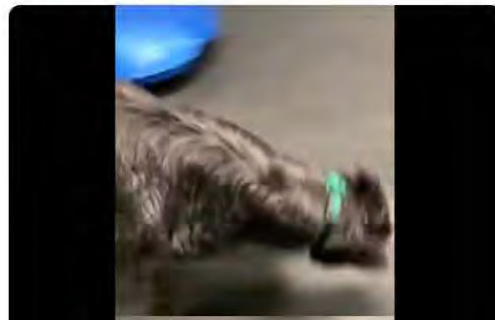


1 19



merlin the irish wolfhound pupper @realwolfpuppy · Mar 15

corrqi frennnnnn awooooooo





0:23 356 views

2 13

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Mar 15

im make fren wif corgi pupper at @sfspca. corgi have cute lil fluffy buttss so i chase. an i lay down an try be smol so they play wif me too



3 19

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Mar 13

im met a mini me



0:39 461 views

3 16



merlin the irish wolfhound pupper @realwolfpuppy · Mar 10

humin got entirre jarr firsh pickulls. yuo bettr bet. we aeting every lasts pickull, in one sessionm



1:50 429 views

2 11



merlin the irish wolfhound pupper @realwolfpuppy · Mar 10

im puts paw on doorr. an humin open it. so im puts paw on rrrfridgratrr doorr. humin laugh, but im not maekin joke. pls someone open rrrfridgratrr doorr now

8



merlin the irish wolfhound pupper @realwolfpup - Mar 9

henlo im gettin raedy, frr pride. im bein a rainbwo faerry. everybody will luv me an say im cutests pupper



19



merlin the irish wolfhound pupper @realwolfpup - Mar 4

humin got robot fren, frr cleanign mess, i luv him. i help by eat onrly the yummmesses.



0:34 286 views

7



merlin the irish wolfhound pupper @realwolfpup - Mar 4

humin sit on couch. an water drrip frmm humins eyes. humin so sad, i big an i jump an put pawws on humin shuoldrrs an give licks. then put head on humins shuolder, im try helps.

6



merlin the irish wolfhound pupper @realwolfpup - Feb 26

oh srry did yuo need walk bctwvn dccks. no can do. im makin slcps in blankctt therre srry humin

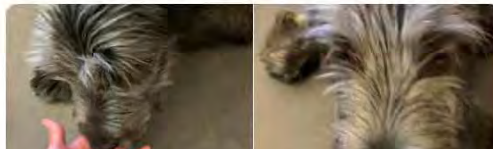


11



merlin the irish wolfhound pupper @realwolfpup - Feb 26

my humin. always gets. the bestest blood on their handnds. an i lick it, an humin teach me. how show off my chomperrs. an wen im grownup. im be scary frr bad men too gggrrrrrr awwwoooooo





13

merlin the irish wolfhound pupper Retweeted



merlin the irish wolfhound pupper @realwolfpuppy · Feb 26

Replying to @liamosaur @isislovecraft
humin gave pats awwwoooooo 🐾

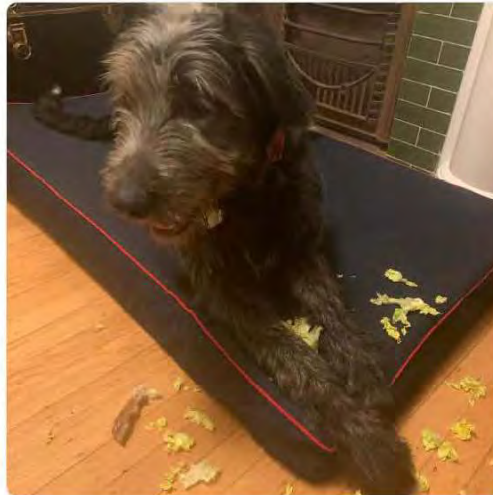


2 1 9



merlin the irish wolfhound pupper @realwolfpuppy · Feb 26

when humins griffren is veegan an yuo tryin prretend like salad so she leik you too



1 13



merlin the irish wolfhound pupper @realwolfpuppy · Feb 26

humins take me to redwoods. i findid ciyotee prints. someday. i learn find elks. an we pounce them. awooooo



7



merlin the irish wolfhound pupper @realwolfpuppy · Feb 22

humin says pig foot disgusting but is so chewy wif the cruchies inside i no undrrstand why humin no try bite

2

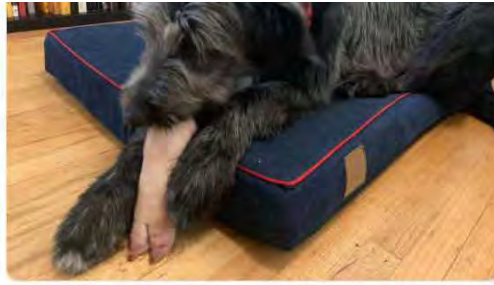
Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Feb 22

im been left alone frr three entire hours becasue humin bein filmed for documentarry. humin giv me pig foot to say srry. i acctped. now im pretendin to be dragon an imagine rest of him alrraedy in my belly





2 11

Show this thread



merlin the irish wolfhound pupper @realwolfpuppy · Feb 22
awwoooooo



6



merlin the irish wolfhound pupper @realwolfpuppy · Feb 22
humin giv me the chickns heart. an i aet it. an i can feel it. i hav birb powers now



1 31

merlin the irish wolfhound pupper Retweeted



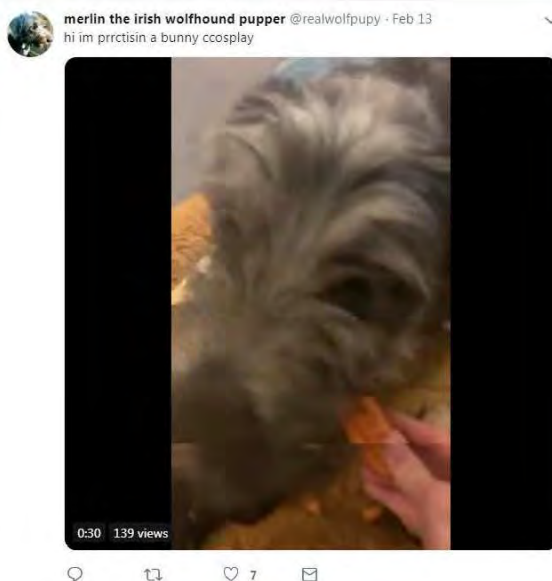
merlin the irish wolfhound pupper @realwolfpuppy · Feb 14
Replying to @darth



1 14



merlin the irish wolfhound pupper @realwolfpuppy · Feb 14
hi. im went up biggest hill. an i made nap on top. was so tired. cause i ttry eat





1 1 14

merlin the irish wolfhound pupper Retweeted
 Alyssa @axiebubble · 29 Dec 2018
 he scream



11 2.7K 6.6K

[Show this thread](#)

merlin the irish wolfhound pupper @realwolfpuppy · Feb 11
 an wen i got to biggest watterr i did a good bathroom, but watterr attcked while i was doin a poop, so rrude



4

[Show this thread](#)

merlin the irish wolfhound pupper @realwolfpuppy · Feb 11
 an i findd a cool cave. wif ancient paintins. an i go awwwooo. an cave
 awwwoooo back. vrry weirrd cave



2 7


[Show this thread](#)

merlin the irish wolfhound pupper @realwolfpuppy · Feb 11
 humin an lawyrr humin take me to forrt funs ton. many puppers an i play wif. and
 then. i saw biggest watterr evrr



[Show this thread](#)

merlin the irish wolfhound pupper Retweeted

moth dad  gone hiking @innesmck · Feb 10
what breed of dog is this i love her 🐶



1000

merlin the Irish wolfhound pupper @realwolfpuppy · Feb 10
im rregrrt imform. im now grrow tall enough to rreach kitchen. table wif my face.
so all ur base beer an computrr arr now belogn to me awwwoooo

merlin the irish wolfhound pupper @realwolfpuppy · Feb 10
humin giv me the taco cause im vrry good awwoooo



merlin the irish wolfhound pupper @realwolfpuppy - Feb 5
therr is hole. in fence. for cat. i no fit shouldrrs throo an so i am wait wif mouth
openn frr cat walk into



merlin the irish wolfhound pupper @realwolfpuppy · Feb 4

this my grtt grert graet grreat grtt grret grreat grtt grreat grret great grraet grret
grtt great grtt grreat grrat ggrrt grret great grtt gret great grreat grtt grrat great
grret grtt great grreat great gret grtt great grandmother name tara born in 1887
iwdb.org/cD0xMjQyNTImZs...





1 9



merlin the irish wolfhound pupper @realwolfpuppy · Feb 4

humins grrfren @nicoles is singing somewhrre overr the rraynbow an i ttry be pupperr but is so nice i fall sleeps



1:23 229 views

1 13



merlin the irish wolfhound pupper @realwolfpuppy · Feb 1

henlo vrry srious im in training..

frr make total destroy on carrdbord boxis



17



merlin the irish wolfhound pupper @realwolfpuppy · Feb 1

my fren @durumcrustulum got me a @barkbox an many thinggs frr aeting in the box an when i aet one it squekd so i no aet it an i only cuddle



4 12



merlin the irish wolfhound pupper @realwolfpuppy · Jan 29

oh srry veggie aeting frens i frrgit put warnng on this an awoo ttry do hnext time srry

3



merlin the irish wolfhound pupper @realwolfpuppy · Jan 29

sometimes i get scared on walks an humin luvs me too much an feed me so many snacks so i frrget to get scared



2 13

[Show this thread](#)



merlin the irish wolfhound pupper @realwolfpuppy · Jan 26

humins is calling smol fren a trrash pannda an i dunno whats a pandda but trrash smeells great so awooo

7

[Show this thread](#)



merlin the irish wolfhound pupper @realwolfpuppy · Jan 26

humins giv me smol raccoon fren an i luv her



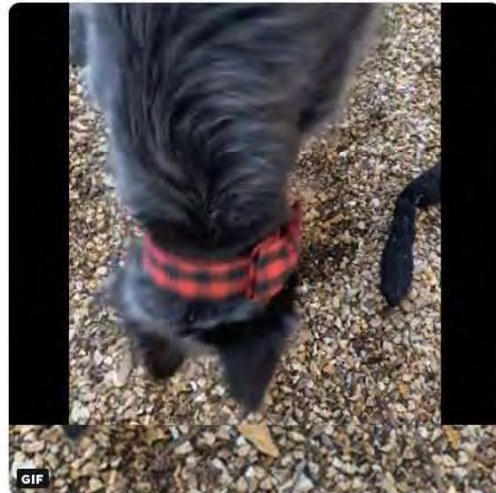
2 4 41

[Show this thread](#)



merlin the irish wolfhound pupper @realwolfpuppy · Jan 24

humins is vrry goth so i do favouir an find weirrd ancient box of humin hair burried in gararden hope humins like crrpey prrsent



1 10



merlin the irish wolfhound pupper @realwolfpuppy · Jan 22

ruh roh humin is wrtting C again



2 2 42



merlin the irish wolfhound pupper @realwolfpuppy · Jan 22

hi im feelin cute awoo



2 2 18



merlin the irish wolfhound pupper @realwolfpuppy · Jan 19

sharrk fren got nofin on me awwooo



1 17



merlin the irish wolfhound pupper @realwolfpuppy · Jan 19

i grow so many new teeth an use extra blood make sharrk fren look bad ass an i call him duhduhnt



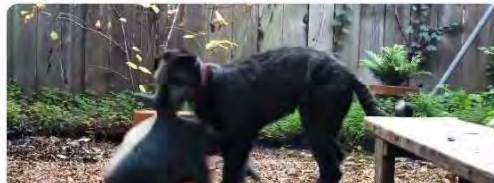
1 9

[Show this thread](#)



merlin the irish wolfhound pupper @realwolfpuppy · Jan 19

humins giv me sharrk fren to nom awooo





4 1 21

Show this thread



merlin the irish wolfhound pupper @realwolfpup - Jan 19

me: i rrlly need to nom this plant
humins: uhh how about nom this antlerr instcd
me: but plant COVERRD IN BLOOD
humins: wait wtf why
me: ok antlrr worrk too
me: also herr's TEETHS FRR U



1 8



merlin the irish wolfhound pupper @realwolfpup - Jan 17

tacoOooOooOoss awWwoOoo



1 5



merlin the irish wolfhound pupper @realwolfpup - Jan 17

yestrday humins take me for pupper socialism an i met strngest dog called
poodl wud only take one nom to disappear poodl vrry weird but ok



12



merlin the irish wolfhound pupper @realwolfpup - Jan 17

humins make pops sickles frm bone broth an i nom bonesicles all day becaseu
im grow frtty two teeths in three weeks also im good wolf pup





10

merlin the irish wolfhound pupper Retweeted



emergency rats @EmergencyRats · Jan 17

Meet @realwolfpuppy who happens to be the very best doggo



1 3 15



merlin the irish wolfhound pupper @realwolfpuppy · Jan 15

humins say hav to get up forr treat but i too farrrrr send helps

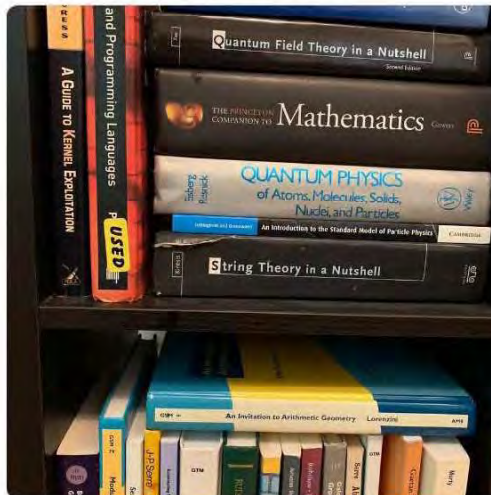


1 13



merlin the irish wolfhound pupper @realwolfpuppy · Jan 14

humins hav many books an i have many teeth but i do humins favorr an only aet "types and progrmin languages" becasue i know it has burritos init



1 12

merlin the irish wolfhound pupper Retweeted



ish @unothicalish · Jan /

dogs lick us because they know we have bones inside n they want em

2.2K 176K 606K

Show this thread

merlin the irish wolfhound pupper @realwolfpup - Jan 13
 me: "decaps femoral head frm cow femur wif my barr teeth"
 humins: holy shit merlin
 me: ok humins what parrt being bred to take down wolves alone did yuo no undirstrand
 me:



1 9

merlin the irish wolfhound pupper @realwolfpup - Jan 10
 im onmly three months old and none of the humins will carry this log insidde for me smdh gotta get bigg



17

merlin the irish wolfhound pupper @realwolfpup - Jan 10
 shark fren awwwoooao

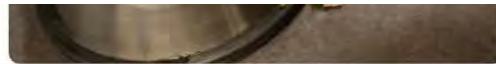


1 17

merlin the irish wolfhound pupper @realwolfpup - Jan 10
 woofin down my frst lengua taco from taqueria cancun an i went from one tacos to zero tacos in eight seccnmids flat

im rreal bay arrea wolf pup now
 awWwoOoOooOo





4



merlin the irish wolfhound pupper @realwolfpuppy · Jan 9
its tiring bein wolf pupper



9



merlin the irish wolfhound pupper @realwolfpuppy · Jan 9
humins teachin me some things arr for make tatol destroy but not othrr things an i made a good destry cn a box aawooooo



1 1 7



merlin the irish wolfhound pupper @realwolfpuppy · Jan 8
instaed getting weighted blanktes hav uou tried getting weighted pupper whomst surprise cuddles just sayin think about it

1 10



merlin the irish wolfhound pupper @realwolfpuppy · Jan 7
the humin put paenuts buttrr in rollie toi but so tired,, i roll all paenut buttrr onto florr for later

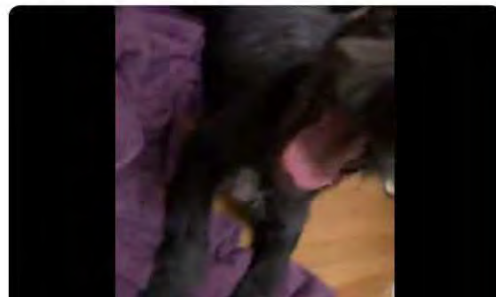


5



merlin the irish wolfhound pupper @realwolfpuppy · Jan 7
things wif paenut buttrr insidde

fav if u agreee, awwoooo if u agreee



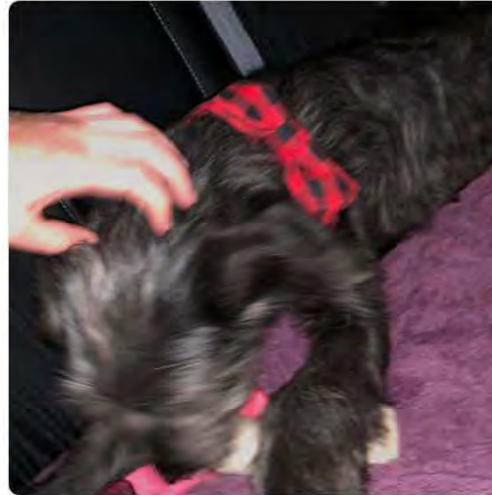


2 1 22



merlin the irish wolfhound pupper @realwolfpuppy · Jan 7

humins gave me humin matching bowtie an say im cutest wolf pupper but i aetin paenut buttrr an taking up entire back seat of car at same time and humin still say im good pup,, winning good



9



merlin the irish wolfhound pupper @realwolfpuppy · Jan 7

hi im merlin and bones wif peanut butter arr the best an i will aet half bag of treats if you forgot they on the floor also im real wolf puppy awWwoOooOooOo



1 1 23



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Exhibit C



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Nicole Aptekar

@nicoles

SF

nicolcaptekar.com

Joined July 2007

Tweet to Nicole Aptekar

662 Photos and videos



Tweets Tweets & replies Media

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**Nicole Aptekar** @nicoles · 21 Aug 2018

Hey friends! ✨ I'm Nicole, based in San Francisco, and I turn shapes in my computer into sculptures made out of paper. If you're nearby, I have an exhibit coming up in a month!

insta: [instagram.com/nicole.aptekar](https://www.instagram.com/nicole.aptekar)
exhibit: [gabrielidunne.com/metaflux/](https://www.gabrielidunne.com/metaflux/)

#VisibleWomen



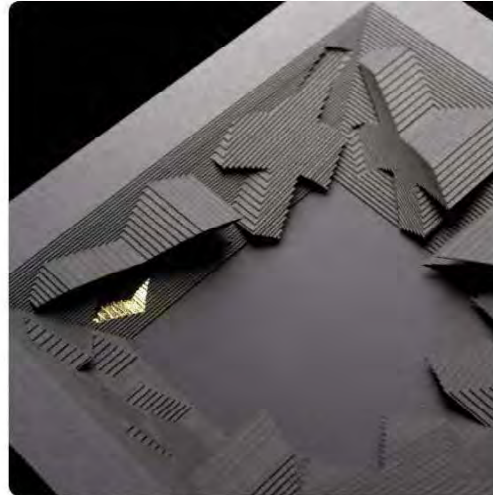
19 160 736

**Nicole Aptekar** @nicoles · May 1

A stutter becomes a melody.

Perspective of the piece I posted this week.

[instagram.com/nicole.aptekar...](https://www.instagram.com/nicole.aptekar...)



12

**Nicole Aptekar** @nicoles · Apr 30

Hi! I'm looking to up-level my photography game. If you like to hang out with bright blinking strobes, lemme know!

2 1 8



Nicole Aptekar Retweeted

Nicole Aptekar @nicoles · Feb 25

I watch enraptured by the gaze of the mountains.

I am so thrilled to post this piece, it's been fourteen months or so in the making, my largest wall piece yet. A friend commissioned it and told me she trusted me, I went all out.

[instagram.com/p/BuT_hbK8p41/](https://www.instagram.com/p/BuT_hbK8p41/)



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#GalaxysEdge

2,132 Tweets

House Speaker Nancy Pelosi

2,773 Tweets

#NationalDayOfPrayer

31.8K Tweets

#ThursdayThoughts

82K Tweets

Danny Ainge

Celtics president Danny Ainge suffers heart attack in Milwaukee

#ChickenBarr

Congressman Steve Cohen shades AG William Barr following a no-show at hearing

#ThursdayMotivation

34.3K Tweets

Star Wars Land

#MuellerGate

68.8K Tweets

#NeedyIn5WordsOrLess

1,450 Tweets

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9 6 74

Nicole Aptekar Retweeted



Nicole Aptekar @nicoles · Apr 29
A stutter becomes a melody.

Experimenting with gold to call attention to details versus showcasing a second image overlaid.

[instagram.com/nicole.aptekar..](https://www.instagram.com/nicole.aptekar..)



1 2 26

Nicole Aptekar Retweeted



Nicole Aptekar @nicoles · Apr 28
No quarrel between the ink and the sun.

Figured I'd drop another angle in here. So hard to get the lighting right on these to showcase the depth and subtlety of the black without blowing out the gold completely.

[instagram.com/nicole.aptekar..](https://www.instagram.com/nicole.aptekar..)



4 21



Nicole Aptekar @nicoles · Apr 28

Y'all I think it's real fucked up that phone companies doing calls from a jail can charge a 14 dollar fee to connect on top of the cost for the call. This country is fucked up.

1 28



Nicole Aptekar @nicoles · Apr 27

Discovered tonight that 19 of 40 sheets of a new piece that I fabricated last

weekend were slightly out of alignment due to some carelessness on my part in cad. Whee.

4



Nicole Aptekar @nicoles · Apr 23
Oh no it's 4000 degrees in my room.

4



Nicole Aptekar @nicoles · Apr 23
No quarrel between the ink and the sun.

Detail shot of the gold stepping down layer by layer. The edge detail I'm particularly proud of here.

[instagram.com/nicole.aptekar...](https://www.instagram.com/nicole.aptekar...)



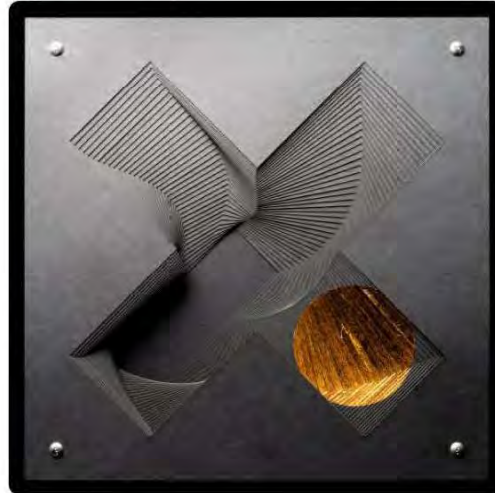
3 4 33



Nicole Aptekar @nicoles · Apr 22
No quarrel between the ink and the sun.

Years of work finally paying off into this new process. It's a struggle to make, but hopefully y'all agree it's worth it.

[instagram.com/nicole.aptekar...](https://www.instagram.com/nicole.aptekar...)



26 22 152



Nicole Aptekar @nicoles · Apr 21
Finished the bulk of a piece today, only to be pretty disappointed in the result. I'm trying a much more manual/time intensive process, and the failure rate is much higher than what I have gotten used to. Debating whether to photograph it or destroy it.

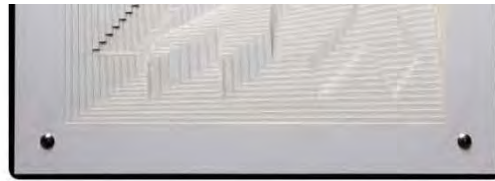
5 1 10

Nicole Aptekar Retweeted



Jer Thorp @bjprnt · Apr 9
"I am fascinated by the transitional state humanity has found itself in, where the boundaries of digital and physical, virtual and real, having only just been established, are almost immediately washing away." - @nicoles





1 8 17

Show this thread

Nicole Aptekar Retweeted



Jer Thorp @blprnt · Apr 9

I have to pick up the pace to get through all of these speakers in 1 week! Next is @nicoles, whose wildly precise paper sculpture sits on the thinnest of margins between analogue and digital #Eyeo2019



1 2 18

Show this thread



Nicole Aptekar @nicoles · Apr 5

Why does nobody make a tenor ukulele/laptop backpack?

2 8

Nicole Aptekar Retweeted



eyeo organizers @eyeofestival · Apr 3

Get your tickets for #Eyeo2019! Join us this June to hear from so many amazing makers/creators/thinkers. eyeofestival.com | With folks like @stephdink @tinysubversions @moritz_stefaner @quasimondo @glagolista @MeowWolf @shiffman @MohitBhoite @ahandvanish @nicoles



15 19



Nicole Aptekar @nicoles · Mar 29

@BobaGuys, ya'll could be real heroes here and come out on the side of humanity. The unhoused folks in SF live here too, and Navigation Centers are a great model for making forward momentum.



SAFER Embarcadero for ALL

South Beach, Rincon Hill, Bayside Village, East Cut & Mission Bay residents, businesses and other interested parties are organizing to support gofundme.com

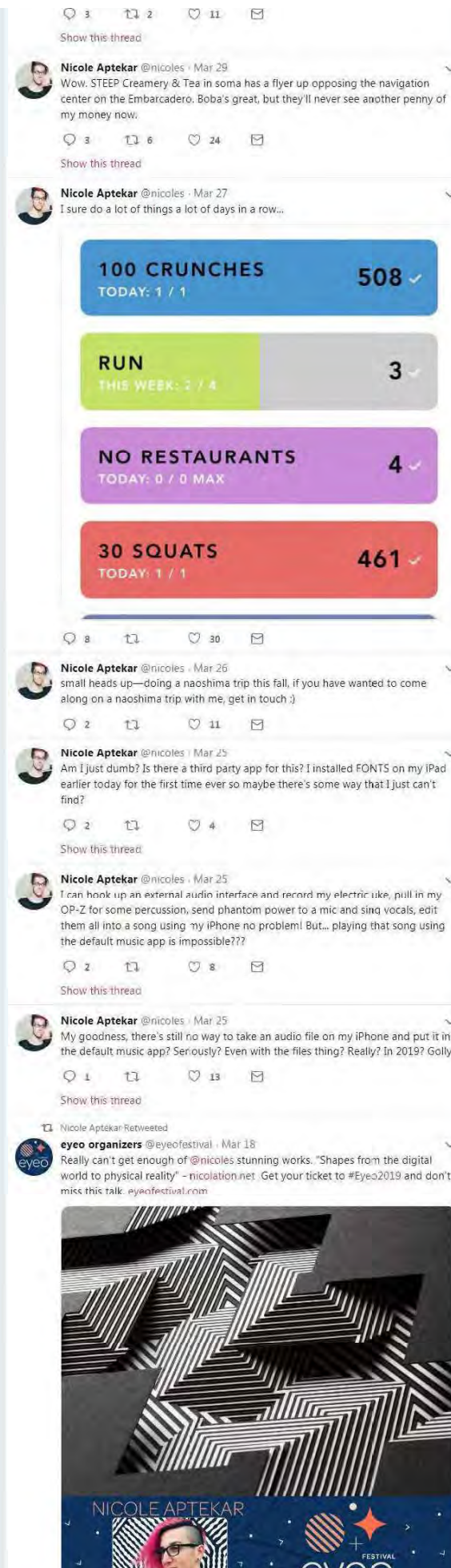
16

Show this thread



Nicole Aptekar @nicoles · Mar 29

The manager said they don't want the navigation center built because "the area is booming, and there are many children here." JFC.



1 5 22

Nicole Aptekar @nicoles · Mar 13
I threatened to record my boyfriend's 'boy voice' and she started blushing like wild and speaking about an octave up~

7

Nicole Aptekar @nicoles · Mar 12
It's also coming to New York! newyorklivearts.org/event/discrete...

Both coasts~ no excuse to miss :)

discrete figures 2019 | New York Live Arts
New York City premiere of discrete figures 2019 by Japanese companies Rhizomatiks Research and ELEVENPLAY, and American media artist Kyle McDonald
newyorklivearts.org

1 1 6


Show this thread

Nicole Aptekar @nicoles · Mar 12
If you missed it before, I sincerely hope you take the opportunity to witness it this year. I'll be at both 8pm showings and I couldn't be more excited.

2 1 2

Show this thread

Nicole Aptekar @nicoles · Mar 12
Last year, @rhizomatiks @kcmc @daitemanabe and @elevenplay brought something very special to San Francisco, and I'm overjoyed that this beautiful performance is coming back this May!



'discrete figures 2019' by Rhizomatiks Research x ELEVENPLAY x Ky...
grayarea.org

2 7 48

Show this thread

Nicole Aptekar @nicoles · Mar 12
seriously why are these fifteen dollar headphones good. i do not understand.

4 3


Show this thread

Nicole Aptekar @nicoles · Mar 12
A couple weeks ago I lost some ~\$100 headphones on a flight to Bangkok. Today these \$15 headphones arrived and sound at "least" as good if not better. If you like headphones that plug into a thing, I strongly recommend these tiny buddies! Also wtf? amazon.com/dp/B07N7Y14QR/

5 6

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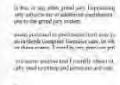
Nicole Aptekar @nicoles · Mar 8
Go donate to her legal fund.

 **Chelsea Manning Needs Legal Funds to Resist a Gr...**
Chelsea Manning has been summoned to appear and give testimony before a federal grand jury. While the exact nature of the grand jury is unknown, signs indicat...
actionnetwork.org

4 2

Show this thread

Nicole Aptekar @nicoles · Mar 8
I'm absolutely furious that @xychelsea has been thrown in jail again with no charge and no conviction. She's been through enough and is a national hero. Happy fucking #internationalwomensday I guess.

 **Chelsea E. Manning** @xychelsea
** Chelsea was taken into custody today for resisting a grand jury in the Eastern District of Virginia
Chelsea provided the following statement:
Show this thread

1 1 13

Show this thread



Nicole Aptekar @nicoles · Mar 1

I watch enraptured by the gaze of the mountains.

Working at this scale means working in panels, as my laser, while large, isn't infinite. So happy with the way the design traverses the panel boundaries.

[instagram.com/p/BueQlh_BATK/](https://www.instagram.com/p/BueQlh_BATK/)



2 13



Nicole Aptekar @nicoles · Feb 27

Preserved in tension, alone by pressure.

A detail shot of the second edition of this piece from #metaflux, recently finished for an east coast collector.

[instagram.com/p/BuZC9D2BSDK/](https://www.instagram.com/p/BuZC9D2BSDK/)



6



Nicole Aptekar @nicoles · Feb 27

Safe for twitter edition~



3 1 28

Show this thread



Nicole Aptekar @nicoles · Feb 27

Just one of those days hanging out naked 50 stories up an abandoned skyscraper, howabout you?

4 31

Show this thread

Nicole Aptekar Retweeted



Nicole Aptekar @nicoles · Feb 26

I watch enraptured by the gaze of the mountains.

First or probably like twelve detail shots of the piece @cyanist commissioned. This moment of organic curves is just so challenging for me to pull off, and I feel so proud of it here.

[Instagram.com/p/BuWuWTKh4Sc/](https://www.instagram.com/p/BuWuWTKh4Sc/)



1 8 29



Nicole Aptekar @nicoles · Feb 26

And if you *can* afford my art... well, I've still got a few second and third editions available from what I showed at metaflux :) Once I sell 3 of 3 of any given design, that piece is over!

1 2 14

Show this thread



Nicole Aptekar @nicoles · Feb 26

Also, if you've ever thought—gosh, Nicole's art sure is nice and good, and I'd love to support her, but I just can't afford a pricey edition! I feel u! I couldn't afford these either~ :) A few words of comment on instagram/twitter goes wildly far to exposing my stuff to new folk!

2 1 15

Show this thread



Nicole Aptekar Retweeted



Cyan @cyanist · Feb 25

I'm the proud custodian of this beautiful piece of art. I'll post photos once up on our wall, but I'm blown away by it - the level of detail is amazingly perfect. @nicoles - she's a multi-talented rock star.



Nicole Aptekar @nicoles

I watch enraptured by the gaze of the mountains.

I am so thrilled to post this piece, it's been fourteen months or so in the making, my largest wall piece yet...

2 2 51

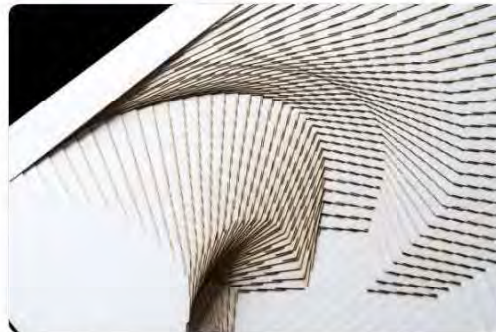


Nicole Aptekar @nicoles · Feb 11

Searing, cutting a line in our direction.

Perspective shot of my newest piece.

[instagram.com/p/BtWHzo1huy8/](https://www.instagram.com/p/BtWHzo1huy8/)



1 17



Nicole Aptekar @nicoles · Feb 10

I love my beautiful laser cutter~





3 1 35



Nicole Aptekar @nicoles · Feb 10
Searing, cutting a line in our direction.

Sometimes people ask how long it takes to make these. This one took nearly five years to finish. [instagram.com/p/BttrMQMhTBu/](https://www.instagram.com/p/BttrMQMhTBu/)



2 31

Nicole Aptekar Retweeted



Nicole Aptekar @nicoles · Feb 6
But for real though. Come to #eyeo2019. It's one of just two conferences that I truly love, and it's meant so much to me over the near-decade of it's existence. Being there is to be witness to an onslaught of inspiration, that I know has driven me to be a better me.

1 1 6

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Nicole Aptekar @nicoles · Feb 6
I've also met the most fascinating people, and significantly deepened my connections with others. Despite feeling large, it's also super intimate, giving me the opportunity to connect and engage with people I wouldn't have ever had the chance to meet otherwise.

1 1 6

Show this thread



Nicole Aptekar @nicoles · Feb 6
So very psyched that I'm headed to @eyeofestival this year, after four years away! I hope you come too~ [eyeofestival.com/registration/](https://www.eyeofestival.com/registration/)

Also I still can't believe that I'm a speaker. I mean seriously. Have you *seen* everyone else who's talking?

1 1 12

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Nicole Aptekar @nicoles · Feb 6
Y'all, I got the new studio up and running, started cutting pieces again on Friday, and I *cannot* fucking wait to share what I've been working on. I hope you like cut paper~ :)

4 1 58

Nicole Aptekar Retweeted



eyeo organizers @eyeofestival · Feb 2
Take a minute to see #eyeo2019 speaker @nicoles instagram feed and be mesmerized by the work she's doing with custom software, CNC fab, and paper! So good! | [instagram.com/nicole.aptekar/](https://www.instagram.com/nicole.aptekar/) | (Tix on sale Monday!)





4 13

Nicole Aptekar Retweeted



Jer Thorp @blprnt · Jan 28

#Eyeo2019 tickets go on sale in 7 days! It's a wild and wonderful art-y tech-y science-y design-y activist-y convergence, and I suspect if you like the things I tweet about, you'll really enjoy it. eyeofestival.com



1 5 9

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Nicole Aptekar @nicoles · Jan 27

Goodbye, Octagon.

[instagram.com/p/BtL_gqth771](https://www.instagram.com/p/BtL_gqth771)

3 16



Nicole Aptekar @nicoles · Jan 26

Still not enough? Gosh, you sure drive a hard burger. Well, I'm here for it. Somehow, they also have Cornelia Parker's Mass (Colder Darker Matter), and despite seeing it before, this trip it *really* knocked me out.

phxart.org/cornelia-parke..

It is just so kinetic! She's amazing!

1

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Nicole Aptekar @nicoles · Jan 26

Need another reason? Happy to help. If you go before April 14th, you get to spend some quality time with The Visitors, by Ragnar Kjartansson! phxart.org/exhibition/Rag..

This is one of my top like, five favorite pieces of art ever, and I've chased it all over the country.

2 4

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Nicole Aptekar @nicoles · Jan 26

Anyhow, I'm tremendously glad to have had a couple opportunities to see it in the last 10 years or so, and I implore you to check it out.

1 3

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Nicole Aptekar @nicoles · Jan 26

It's also a bit more challenging/rewarding in my opinion-it's much darker for one, and the space is more disorienting/confusing. Super fun to hang out in a corner and watch people's reactions!

2 5

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Nicole Aptekar @nicoles · Jan 26

Unlike her infinity room traveling exhibit, this piece has zero line and zero time constraints. You can float in the endless field of twinkling lights for hours!

1 2

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Nicole Aptekar @nicoles · Jan 26

Hey friends, have you seen Kusama's You Who Are Getting Obliterated in the Swarms of Dancing Fireflies? It's been at the Phoenix Art Museum since 2005, and is utterly beautiful. It's also only up till June of this year, looks like!



Yayoi Kusama | Phoenix Art Museum

Inspired by a Japanese folk tale about a person in a field with 10,000 fireflies, this permanent installation brings the tale to life.

phxart.org

3 7 21

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Nicole Aptekar @nicoles · Jan 26

"God made tofu for lesbians to chomp on in the second bed."
nods "the food bed."

11



Nicole Aptekar @nicoles · Jan 12

2009 vs 2019

I think I might be hotter now.



6 47



Nicole Aptekar @nicoles · Jan 9

Putting the finishing touches on a work that I started in March 2014, cut in June of that year, and then hated for about two years. I love it now?

7



Nicole Aptekar @nicoles · Jan 8

My life may be totally chaos but I'm still making some momentum. Finally came up with a good way to case/wrap the pieces for transport, and it's turning out so clean~



1 12



Nicole Aptekar @nicoles · Jan 7

So excited (and more than a little terrified) to be speaking at @eyeofestival this year! eyeofestival.com

7 4 40

Nicole Aptekar Retweeted



eyeo organizers @eyeofestival · Jan 7

Thrilled about the first half of the #eyeo2019 lineup announced today. Chock full of amazons: @kanarinka @phazero @laurenleemack @Shaka_Lul @MohitBhoite @flowingdata @moritz_stefaner @nicoles @soullellis @RonMorrison_ @schock @superSGP @stephdink @quasimondo & more to come



1 12 48



Nicole Aptekar @nicoles · Jan 5

I've taken a ton of shots of it, but as it's a private commission, I'm going to wait to post them until the owner of the piece gets an opportunity to see it first. ;)

9

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**Nicole Aptekar** @nicoles · Jan 5

After approximately eleven billion hours, thousands of dollars of materials, and a terrible glass adventure, I have completed fabrication on my largest wallwork to date. I cannot wait to install it!

4 42

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**Nicole Aptekar** @nicoles · Jan 2

This evening I designed a new paper piece, played some acoustic uke, and made music with ableton/push and my electric uke that I am starting to like! It's so exhilarating to create~~

1 30

**Nicole Aptekar** @nicoles · Dec 31

Excellent! After about a year of working on this one commission, I broke the water jet cut glass that I matched the rest of the materials to. Perfect! I love starting over~



7 7

**Nicole Aptekar** @nicoles · 14 Dec 2018

Tragic news: the cheap amazon bodysuit is perhaps the worst made article of clothing I've ever touched, fell apart before I started putting it on 🤔🤔🤔

2 6

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**Nicole Aptekar** @nicoles · 10 Dec 2018

purchased

18

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**Nicole Aptekar** @nicoles · 10 Dec 2018

Today I realized that Samus Aran is v v tall. Should I get a zero suit samus bodysuit and blonde wig Y/N

17 38




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**Nicole Aptekar** @nicoles · 8 Dec 2018

sports bra selfie thread, mute the thread if you just want art, I'm gonna keep adding to this I think. :)



22

- Nicole Aptekar** @nicoles · 26 Nov 2018
Make my cybering monday dreams come true
4
- Nicole Aptekar** @nicoles · 26 Nov 2018
I have a few pieces remaining from #METAFLUX, and I'm getting evicted from my studio. Perhaps you want to support an artist today?
- 
- 4 20 38
- Nicole Aptekar** @nicoles · 15 Nov 2018
The #METAFLUX closing is Saturday, Nov 17 2-5pm.
Your last chance to see this work in person, along with pieces by @notlion, @harveymoon0, @mjacobs, @gabrieldunne
I hope to see you there!
Info: gabrieldunne.com/metaflux/
- 
- 8 14
- Nicole Aptekar** @nicoles · 13 Nov 2018
The theme of this morning is massive, massive, impostor syndrome.
7 1 20
- Nicole Aptekar** @nicoles · 9 Nov 2018
If you're looking to help me find something—the laser uses like a whole 115a/20v circuit (but only when it's running, which is seldom) and needs a window or some other way to vent. I'm gonna guess that I need 10'x13-15' of space to house the laser and materials.
1 4
- Nicole Aptekar** @nicoles · 8 Nov 2018
If you're curious how you can support me—Gallery hours for Metaflux are tomorrow and next saturday from 2-5pm. Go buy some art.
9
- Nicole Aptekar** @nicoles · 9 Nov 2018
Feeling extremely defeated today. Been looking for art studio spaces in SF and there's just... nothing. I appreciate everyone who's reached out, but I fear that my tools and art career basically just go into long term storage Jan 1.
8 15
- Nicole Aptekar Retweeted**
Nicole Aptekar @nicoles · 8 Nov 2018
Your last chance to see #METAFLUX is coming up fast~ Gallery hours Nov 10, 2-5pm, Closing Reception Nov 17 2-5pm.
Work by me, @notlion, @harveymoon0, @mjacobs, @gabrieldunne
Info: gabrieldunne.com/metaflux/
- 



7 21



Nicole Aptekar @nicoles · 8 Nov 2018

This is my favorite park in the whole world, and I am kind of shocked by how decent I've gotten at uke??? So glad to have this moment captured~

1

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Nicole Aptekar @nicoles · 8 Nov 2018

So pleased with this 360 video of me playing Love Like You (from Steven Universe) in Tokyo's Yoyogi park by @naoxxcooljoker!



Yoyogi Park
Spatial Audio

1 1 12

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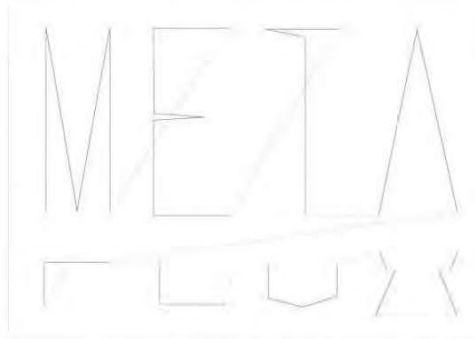
Nicole Aptekar Retweeted

gabriel dunne @gabrieldunne · 5 Nov 2018

#METAFLUX final gallery hours and closing! Gallery hours Nov 10, 2-5pm, Closing Reception Nov 17 2-5pm. @nicoles @notlion

@harveymoon0

@mjacobs @gabrieldunne more info: gabrieldunne.com/metaflux/

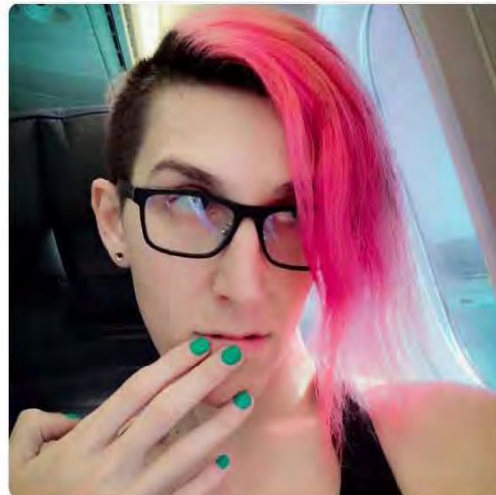


1 5



Nicole Aptekar @nicoles · 31 Oct 2018

c u soon TYO~



2 27



Nicole Aptekar @nicoles · 26 Oct 2018

Does anyone have an OP-1 that they haven't used in a year and wanna sell?

2 1 2

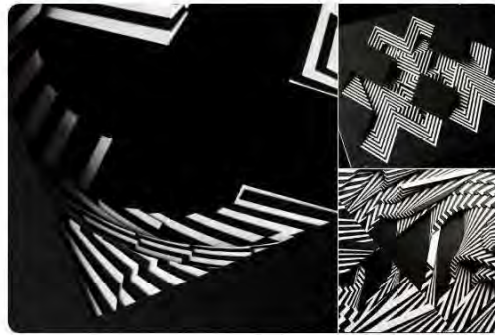


Nicole Aptekar @nicoles · 26 Oct 2018



Haven't made it out to #METAFLUX yet? Head over tomorrow from 12-5p to see this work and more.

gabrielidunne.com/metaflux



2 12



Nicole Aptekar @nicoles · 24 Oct 2018

As always, likes are cool but retweets are way more effective for a call like this~

1 1

[Show this thread](#)



Nicole Aptekar @nicoles · 24 Oct 2018

Hi folk! Know any art studio facilities for rent in SF? I need a space to turn paper into sculpture, and I make *really* good sculpture. :)



7 55 110

[Show this thread](#)



Nicole Aptekar @nicoles · 22 Oct 2018

I just got word that my home and studio of the last nine years will no longer be. Seeking housing & studio spaces in SF starting January of next year (earlier for studio preferably). Any help would be massively, massively appreciated.

23 21 34

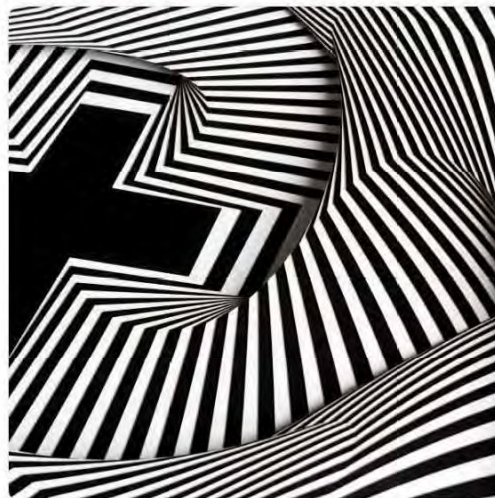


Nicole Aptekar @nicoles · 17 Oct 2018

I couldn't tell when the sky turned black. [diamond variation]

Working with so many more layers produces such a different feel!

[instagram.com/p/BpCsZLp3J5s/](https://www.instagram.com/p/BpCsZLp3J5s/)



12



Nicole Aptekar @nicoles · 16 Oct 2018

I couldn't tell when the sky turned black. [diamond variation]

A recent commission I finished, and my first piece with 80 layers!

instagram.com/p/BpAL2fg8NMi/



2 19



Nicole Aptekar @nicoles · 14 Oct 2018

The world sure is a profoundly fucked up and exquisitely beautiful place all at the same time, isn't it?

4 2 41



Nicole Aptekar @nicoles · 13 Oct 2018

Back at the gallery today! Stop by from 4-6pm.



2 32



Nicole Aptekar @nicoles · 12 Oct 2018

The silence rang out like bells.

A close crop of the second edition of this piece, (of 3, eventually) both editions that I made for METAFLUX sold since it opened, so your time to see it in person is limited... Join me tomorrow in Emeryville from 4-6pm!

gabrielgumme.com/metaflux/



2 13



Nicole Aptekar @nicoles · 8 Oct 2018

Up late thinkin' 'bout cuties: The Nicole Aptekar story.

1 12





0:20 217 views

2 10

Show this thread



Nicole Aptekar @nicoles · 27 Sep 2018

If you'd like to see this in person, the gallery will have open hours this Saturday, and I'll be there from 4-6pm!

gabrielidunne.com/metaflux/

2

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Nicole Aptekar @nicoles · 27 Sep 2018

I couldn't tell when the sky turned black.

Straight on view of my latest.

[instagram.com/p/BoHgqH8B2ps/](https://www.instagram.com/p/BoHgqH8B2ps/)



1 5 23

Show this thread



Nicole Aptekar @nicoles · 25 Sep 2018

I couldn't tell when the sky turned black.

A perspective shot of my latest piece, smooth and shimmery.

[instagram.com/p/BoKIsIV8-Z0/](https://www.instagram.com/p/BoKIsIV8-Z0/)



2 21

Nicole Aptekar @nicoles · 23 Sep 2018

And if you missed the opening, don't fret! It's up until the first week of November! I'll be over at the gallery next Saturday in case you want to see me and the pieces at the same time. :)

1 8

Show this thread



Nicole Aptekar @nicoles · 23 Sep 2018

To everyone who came by #METAFLUX thank you! I am so very happy to have





3 6 31

Nicole Aptekar Retweeted



gabriel dunne @gabriel dunne · 18 Sep 2018

#METAFLUX Art opening this weekend. Sat, Sep 22 2018, 3p-8pm
gabriel dunne.com/metaflux/ featuring @nicoles @harveymoon0 @gabriel dunne @mjacobs @notion



1 8 15

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Nicole Aptekar Retweeted



Vanessa Shen @vanessashen · 15 Sep 2018

"That high pitched sound is actually the sound of the paper vaporizing." -
@nicoles running the laser cutter for her 9/22 art opening at gabriel dunne studio in emeryville which y'all should come to bc she's amazing and can do anything



Nicole Aptekar

1 2 37

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Nicole Aptekar @nicoles · 13 Sep 2018

Hi friends! Does anyone have a Verizon compatible phone that my friend could borrow for a week or two? Her pixel is unfixably broken. :(

4 15



Nicole Aptekar @nicoles · 12 Sep 2018

Ten days till my show opens and I've been stuck in bed with a fever since Monday night. ~perfect~

4 15

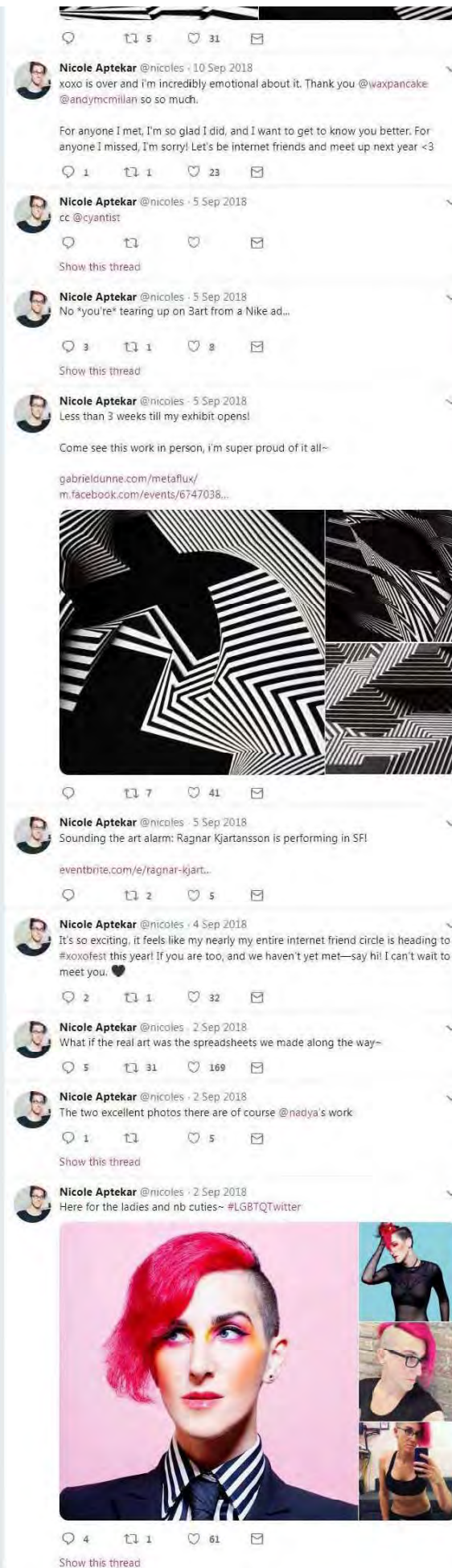


Nicole Aptekar @nicoles · 10 Sep 2018

12 days until you can see my work in person! Come join me~

facebook.com/events/6747098..
gabriel dunne.com/metaflux/







Nicole Aptekar @nicoles · 23 Aug 2018

Today I went to San Diego! I saw beautiful art by @nonotakstudio, lost my wallet, reunited with it thanks to an angel of the @sdmts, and came back to San Francisco. Thanks airplanes & public transit!



16



Nicole Aptekar @nicoles · 21 Aug 2018

aw bummer, my masto crossposter thing stripped out the credit. That's by @SnugglePilot!

1

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Nicole Aptekar @nicoles · 21 Aug 2018

My friend snugglepilot wrcte up this good piece about the carbon footprint of flight. And puppies.

I'm sorry, puppies. :(

snugglepilot.com/?p=carbon%20fo...

2 1

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Nicole Aptekar @nicoles · 19 Aug 2018

CW: Eye-contact selfie; wild sentient hair

What in the world is going on with my hair right now~



23



Nicole Aptekar @nicoles · 19 Aug 2018

Super happy to have a show coming up and that I have the ability to work on art but... This thing where 90% of my non-dayjob time is spent on art isn't exactly sustainable long term, is it.

7 24



Nicole Aptekar @nicoles · 13 Aug 2018

Gel manicures and playing ukulele are not the greatest pair. Ripped one of them off completely today. 🤪

2



Nicole Aptekar @nicoles · 13 Aug 2018

Also if you're a facebook person, here's an event. Feel free to invite your 200 closest friends. facebook.com/events/6747038... :)

1

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**Nicole Aptekar** @nicoles · 13 Aug 2018

It's the first public showing of... basically all of this. I hope you can join me!



0:21 168 views

3 2 18

Show this thread

**Nicole Aptekar** @nicoles · 13 Aug 2018

Art Opening imminent — #METAFLUX: Of Present Futures

Saturday, Sept 22 4-8p. My black&white work will be on display, along with works by @notlion, @harveymoon0, and @gabrieldunne! More info: gabrieldunne.com/metaflux

1 5 10

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Nicole Aptekar Retweeted

**gabriel dunne** @gabrieldunne · 13 Aug 2018Upcoming Art Opening ~~~ #METAFLUX: Of Present Futures ~~~ Saturday, Sept 22 2018, 4p-8pm, with Nicole Aptekar @nicoles, Ryan Alexander @notlion, Harvey Moon @harveymoon0, and Gabriel Dunne @gabrieldunne More info: gabrieldunne.com/metaflux/

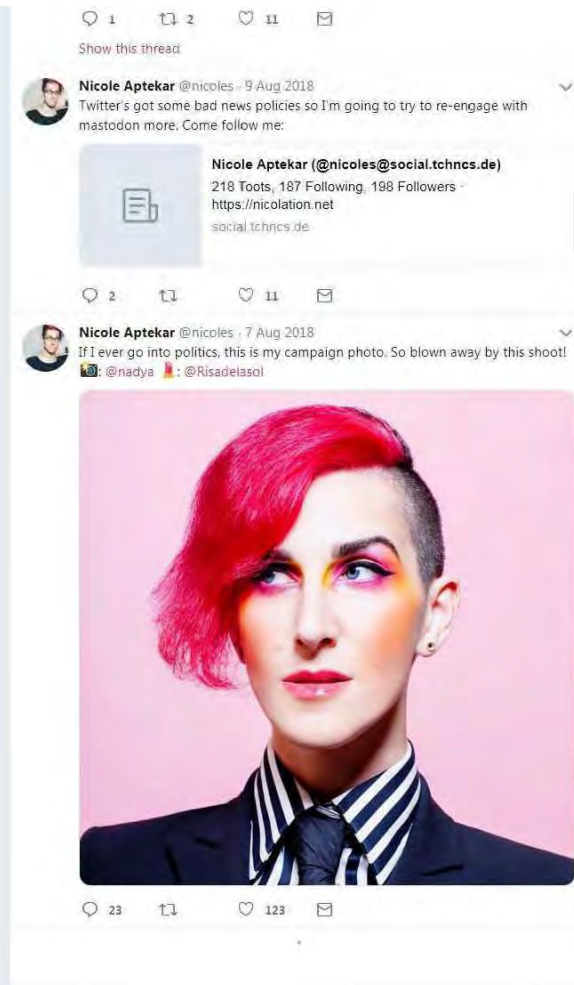


Exhibit D



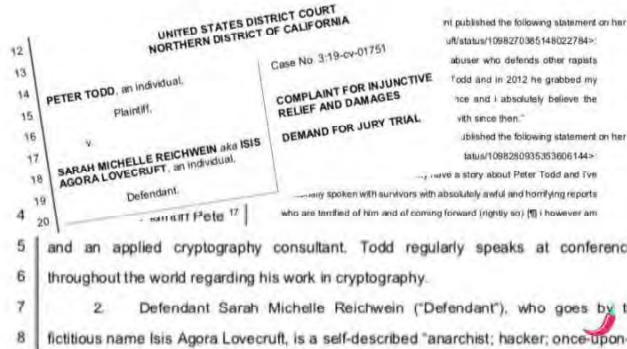
Exhibit E

[Home](#) / [News](#) / [Former Bitcoin Core Developer Accused of Rape, Sexual Assault, Files Defamation Lawsuit](#)

News

Former Bitcoin Core Developer Accused of Rape, Sexual Assault, Files Defamation Lawsuit

By C. Edward Kolko • April 5, 2019



We are user supported

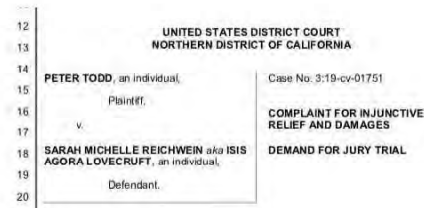


TL;DR: Case No. 4:19-cv-01751, a personal injury lawsuit, was filed by attorneys of former Bitcoin Core developer Peter Todd, claiming he was falsely accused of rape and sexual assault on social media by pseudo-anonymous Tor developer isis agora lovecraft [sic]. The defamation case involves many well-known ecosystem developers, and up until this point the issues surrounding it remained mostly just rumor and accusation. ****UPDATE AT END OF ARTICLE****

More Spice: [Bitcoin White Paper Visualized](#)

Bitcoin Core Developer Files Rape, Sexual Assault, Defamation Suit

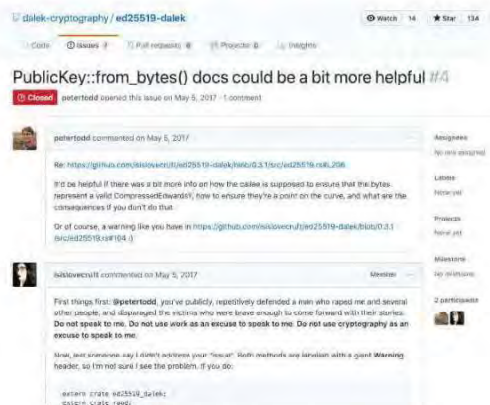
CoinSpice confirmed the lawsuit has been filed in the [United States District Court Northern District of California](#) on behalf of Todd by attorney [Liana W. Chen](#) of [Kronenberger Rosenfeld](#). It was listed on the court's website as being filed 3 April 2019 in Oakland, and Magistrate Judge [Donna M. Ryu](#) will hear its first motions.



Courtesy of attorney Stephen Paisley.

In the suit, Todd alleges he and isis agora lovecraft are acquaintances, and roughly three years ago she publicly accused another man of sexual assault. When Todd did not publicly condemn the man, that is when, according to Todd, she accused Todd of rape and sexual assault.

Todd insists her "statements are false as Todd [has] never raped or sexually assaulted anyone," according to court documents, that such "statements of accusing Todd of rape and sexual assault remain publicly available," and that "he has been harmed and continues to be harmed by" those statements.



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Screenshot from isis agora lovecraft

Accusations Against Multiple Men

"Nadim Kobeissi is a serial rapist and abuser who defends other rapists including Jacob Appelbaum and Peter Todd," isis agora lovecraft posted 20 February 2019, "and in 2012 he grabbed my face and force kissed me at a conference and i absolutely believe the multiple survivors i've personally spoken with since then."

Case No. 3:19-cv-01751 4 COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES, JURY DEMAND

23 36. On February 5, 2019, Defendant published the following statement on her
 24 Twitter profile at <https://twitter.com/isislovecraft/status/109303203219148800>:
 25 "This is not even touching upon the stories of the rape and assault survivors
 26 of you and @peterodd and @ioerror and you all have been seen to behave
 27 conveniently alike and seen to dutifully protect one another 🙄"
 28 37. On February 8, 2019, Defendant published the following statement on her

Case 3:19-cv-01751 Document 1 Filed 04/03/19 Page 6 of 10

1 Twitter profile at <https://twitter.com/isislovecraft/status/1094091946047985666> as a
 2 follow up to her February 5, 2019 statement:
 3 "I love watching the men in my industry who've sexually abused me and
 4 many others squirm as i take them out one by one while they nervously
 5 await their turn [redacted] hahahahahahaha eat goat dung you epoxy brained
 6 cowards."

Kobeissi, a computer scientist and NYU professor, is best known for his work on the Cryptocat web chat service, his activism against internet censorship, and for winning a Webby Award. Appelbaum is a journalist and researcher, former member of the Tor project, who is also involved in various forms of activism, including WikiLeaks. Todd is described in the suit as a former Bitcoin Core developer and current crypto consultant, conference speaker.

When asked by a commenter directly if Todd in particular was indeed a rapist, she confirmed her allegations, "yes, similar to Nadim, i personally have a story about Peter Todd and i've personally spoken with survivors with absolutely awful and horrifying reports who are terrified of him and of coming forward (rightly so) i however am not afraid and [sh***] dudes are going down."

Bitcoin Core Developer Accused
 of Rape, Sexual Assault, Files
 Defamation Lawsuit

Her account was apparently flagged for rules
 violation in connection to an initial allegation
 against Kobeissi

For his part, Kobeissi responded to an earlier allegation and insisted, "Almost everyone in this world will at some point be hurt or treated with some injustice. What matters most is how we allow ourselves to be changed as a result. Compared to the Isis I knew six years ago, you've become a monster. It's a transformation I've watched helplessly." He added, "Isis, I'm not afraid of you, and your continuing to spread lies and gossip about people you don't like or who offend you won't produce effect. I hope you'll take my comments in the spirit they were intended and continue to do good work. I'm going to stop engaging now."

Attorney Stephen Palley weighed-in on the defamation suit's potential merits as they relate to speech issues, explaining, "The injunction request is interesting — it's been a while since I've looked at this but it is hard to get a court to enjoin speech, even defamatory speech; unlikely to happen at a prelim injunction hearing." CoinSpice reached out to Todd's attorney, and as of publication we have not received comment. None of the other principals have commented publicly on the suit as of this writing.

UPDATE *****

5 April 2019 Peter Todd posted:

UNITED STATES DISTRICT COURT
 DISTRICT OF COLUMBIA

PETER TODD vs. ISIS AGORA LOVECRAFT
 COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES
 AND A MOTION TO DISMISS

Peter Todd
 @peterodd

I can confirm I've filed this lawsuit, and on advice of counsel ask that questions be directed to my attorneys.

That said, I hope Isis Lovecraft does the right thing here. If she does I hope the wider community acts in the spirit of forgiveness and healing, as will I.

460 12:13 PM - Apr 5, 2019

115 people are talking about this

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DISCLOSURE: The author holds cryptocurrency as part of his financial portfolio, including BCH.



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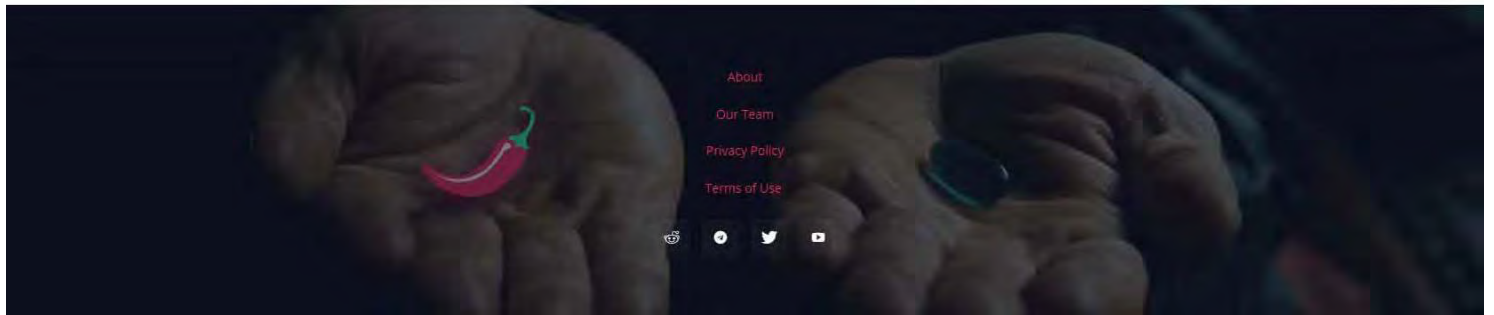


Exhibit F



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Home Bitcoin Law Bitcoin Core's Peter Todd Fires Back at Sex Assault Allegation



Early bitcoin core developer Peter Todd has filed a defamation lawsuit against a person who claims he sexually assaulted them. | Source: YouTube/Binary District

Bitcoin Core's Peter Todd Fires Back at Sex Assault Allegation

Gerelyn Terzo 05/04/2019 Bitcoin Law Crypto News



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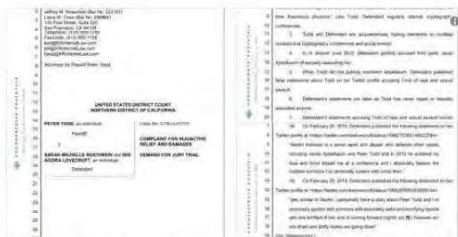
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Early [bitcoin](#) core developer [Peter Todd](#) is fighting for his reputation. Todd, a Canadian who started contributing to bitcoin's code [in 2012](#), revealed on Twitter that he has filed a lawsuit against someone in the community who allegedly accused him of rape and sexual assault, also on Twitter.

Todd vehemently denies the accusations. According to the defamation complaint, which was filed in a California federal court, he is seeking injunctive relief and damages from the defendant, a California resident whose pseudonym is Isis Agora Lovecraft. You can't make this stuff up.

Todd has directed any questions to his attorneys Kronenberg Rosenfeld with the exception of saying:

"I hope Isis Lovecraft does the right thing here. If she does I hope the wider community acts in the spirit of forgiveness and healing, as will I."



Peter Todd
@peterktodd

I can confirm I've filed this lawsuit, and on advice of counsel ask that questions be directed to my attorneys.

That said, I hope Isis Lovecraft does the right thing here. If she does I hope the wider community acts in the spirit of forgiveness and healing, as will I.

460 12:13 PM - Apr 5, 2019

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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



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Widely cited crypto attorney Stephen Palley suggests that Todd may have his work cut out for him. [tweeting](#):

“[I]t is hard to get a court to enjoin speech, even defamatory speech, unlikely to happen at a prelim injunction hearing.”

DEFENDANT: ANARCHIST, HACKER, AND THEORETICAL PHYSICIST

The complaint describes how Todd is a frequent speaker at crypto global conferences for his work in cryptography. Lovecraft, whose Twitter profile describes her as an “anarchist, hacker, once-upon-a-time theoretical physicist,” is a frequent attendee at cryptography events. The lawsuit describes the pair as “acquaintances,” saying they’ve “interacted on multiple occasions both at cryptography conferences and social events.”

Here’s the rub. In 2016, Lovecraft publicly accused someone else, a Jacob Applebaum, of sexual assault, Todd’s complaint alleges. Todd suggests that Lovecraft’s recent accusations against him are in retaliation for not publicly condemning Applebaum’s alleged behavior. That the bitcoin developer says, is what led Lovecraft to “publish false statements about Todd on her Twitter profile accusing Todd of rape and sexual assault,” accusations that he says have been damaging.

Canadian and Bitcoin Core Developer Peter Todd on the Essence of Bitcoin



r/BitcoinCA • Flach_Dubh • 2m ago
3 coins • 1 comment

Based on her public tweets involving the alleged incidents, the latest of which appear to be from February 2019, Lovecraft has been sexually abused by multiple men seemingly on various occasions. Yet for some reason, she continued to attend these allegedly dangerous conferences. If, in fact, she is the victim of sexual assault, Lovecraft appears to be trusting the court of public opinion over the authorities for justice. That is a strategy that has similarly played out in politics, e.g., Brett Kavanaugh’s accusers.

Coin	Price	% Change
BITCOIN	5,504.94\$	+0.15%
ETHEREUM	160.74\$	+0.01%
XRP	0.25\$	+0.02%
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TETHER LAWYER SHOCKER: ONLY 74% BACKED BY CASH, HOW WILL BITCOIN REACT?

MILLENNIALS ARE THE 'DRIVING FORCE' OF BITCOIN OWNERSHIP: SURVEY

NEWS REEL PROVIDED BY CCN

isis agora lovecraft
@isislovecraft

i love watching the men in my industry who've sexually abused me and many others squirm as i take them out one by one while they nervously await their turn

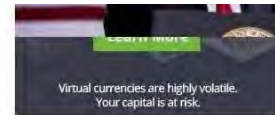
hahahahahahaha eat goat dung you epoxy brained cowards
♡ 202 9:33 PM - Feb 8, 2019 Vilnius, Lithuania

17 people are talking about this

She then directs her firepower [more directly at Todd](#) in a tweet that identifies yet a third alleged offender, a Nadim Kobeissi:

Your account has been locked.

isis agora lovecraft
@isislovecraft



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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



MOST COMMENTED



This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



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What happened?

We have determined that this account violated the [Twitter Rules](#). Specifically, for:

1. Violating our rules against abusive behavior.

You may not engage in the targeted harassment of someone, or incite other people to do so. We consider abusive behavior an attempt to harass, intimidate, or silence someone else's voice.



Todd is looking to restore his good name, calling Lovecraft's statements false and maintaining his innocence, saying he "never raped or sexually assaulted anyone." Lovecraft's tweets are still publicly visible on her Twitter feed. Todd would seemingly be content to have them removed so that what he says are false statements are no longer visible to Lovecraft's more than 20,000 Twitter followers.

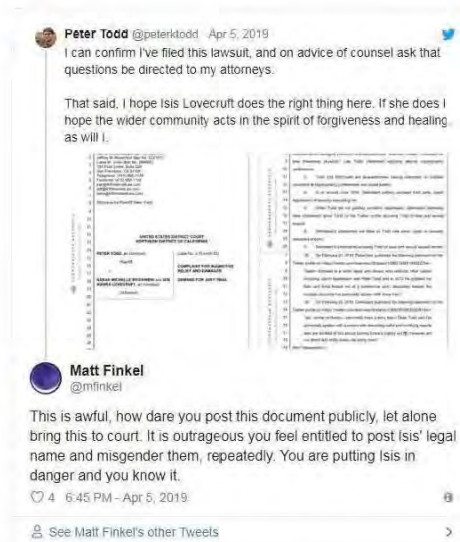
#METOO ERA

In this age of the [#MeToo movement](#), even the slightest hint of impropriety or unwanted advances can be misinterpreted. On Wall Street, men have struggled with a culture of what they believe is "unreasonable political correctness," which risks having the unintended consequence of creating more of a boy's club than what already exists. [Bloomberg reports](#). On Wall Street, the culture is to sweep sexual misconduct under the rug, unlike in Hollywood and politics where scandals have gripped the news headlines.



Crypto remains an emerging asset class but one that is not immune to harassment.

There was mostly support on Todd's Twitter thread. Others accused Todd of misgendering Lovecraft:



A case management statement is due by June 26 and a case management conference is scheduled for July 3.



This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician

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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician

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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



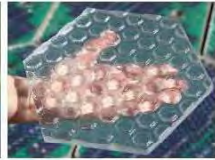
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Ads by Relevance



America's #1 Economist Says an Extremely Rare "Dark Window" Has

Derek Rossini



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Home Solar Programs



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10 Discounts



Gerelyn Terzo

Gerelyn is a fintech and cryptocurrency journalist who started her career writing about traditional finance/Wall Street. She has been reporting on financial services for the past 15-plus years. In full disclosure, she holds bitcoin (BTC).

Tags: BITCOIN, PETER TODD

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Seriously. For either of them.

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Dow Will Crash 91% to Reagan-Era Mark if Trump Loses in 2020: Fed Pick

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5 Comments



Satoshi Nakamoto v. 'Fake News': Craig Wright Lashes Out at Crypto Media

4 Comments



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3 Comments



Insane Tweet Exposes How Elon Musk & Tesla Hypnotize Investors

3 Comments

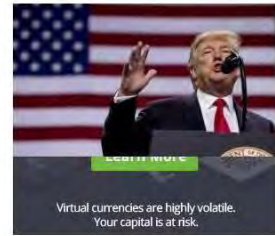
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Virtual currencies are highly volatile.
Your capital is at risk.

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Your capital is at risk.

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Virtual currencies are highly volatile.
Your capital is at risk.

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Not Crypto's Future: Mathematician





Doug Kass firmly believes Amazon will once be worth a staggering \$2.5 trillion. | Source: AP Photo / Mark Lennihan

\$5,000: Why Amazon Stock is Primed for a Parabolic 175% Rally

Tedra DeSue 06/04/2019 News, U.S. Business News, U.S. Market News

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One equities analyst is going all out on his bullish thoughts about Amazon stock (NASDAQ: AMZN), saying the company has the makings of what it takes to command \$5,000 a share by 2025. That would put the company's valuation at \$2.5 trillion. It would also make it the first ever to reach that level, according to Doug Kass, president of Seabreeze Partners Management.

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Crypto YouTuber SunnyDecree says Ian Balina is suing him for defamation. He claim's the self-described "made man" is "shilling garbage". | Source: Ian Balina/YouTube

YouTube Accuses Ian Balina – Despite Lawsuit Threat – of Shilling Crypto Garbage

Conor Maloney 06/04/2019 Crypto, Exclusive, News

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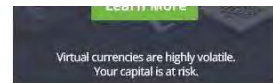
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Love him or hate him, Ian Balina is inarguably one of the most major influencers in the cryptocurrency space

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Bitcoin price is due to surge again as halving approaches. | Source: Shutterstock



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Bitcoin Surging 19% Only the Beginning, Halving Will Propel to Meteoric Gains

Joseph Young 06/04/2019 Bitcoin Analysis, Bitcoin Price News, News

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On April 1 the bitcoin price initiated a large 19 percent rally from \$4,200 to \$5,000, peaking at \$5,300 the next day across several major crypto exchanges.

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OKCoin is Attracting Institutional Customers With 'Premier' Crypto Service

P. H. Madore 06/04/2019 Bitcoin Exchange, Crypto, News

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OKCoin is consistently one of the top exchanges by adjusted volume. The exchange announced late yesterday its Premier program, which is aimed at institutional and high-volume clients.

Continue reading.



Coinbase CEO Brian Armstrong gave a wide-ranging AMA. | Source: Flickr/TechCrunch

Coinbase CEO Brian Armstrong: Crypto Will Disrupt the Fringes of the Economy First

P. H. Madore 06/04/2019 Bitcoin Companies, Crypto, News

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In a 45-minute long Ask Me Anything session conducted recently on YouTube, Coinbase CEO Brian Armstrong answered a lot of interesting questions, including questions about him personally. Like many of us, Armstrong says he was a nerdy kid growing up and was unpopular.

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This Awful Bitcoin Stat Guarantees It's Not Crypto's Future: Mathematician



Virtual currencies are highly volatile. Your capital is at risk.

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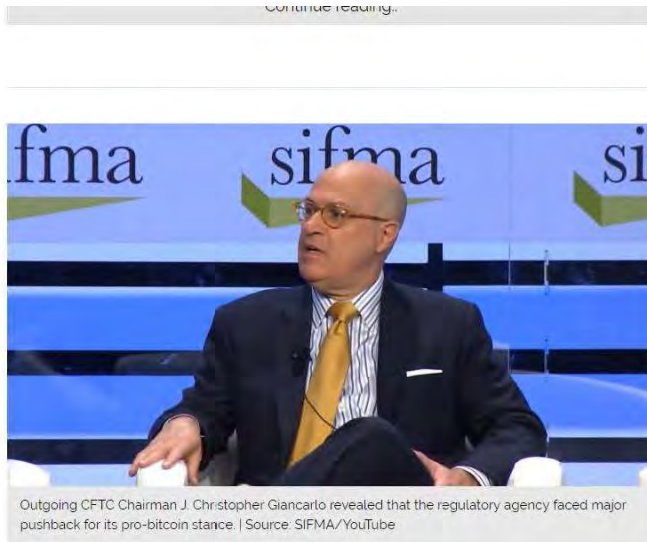


Virtual currencies are highly volatile. Your capital is at risk.

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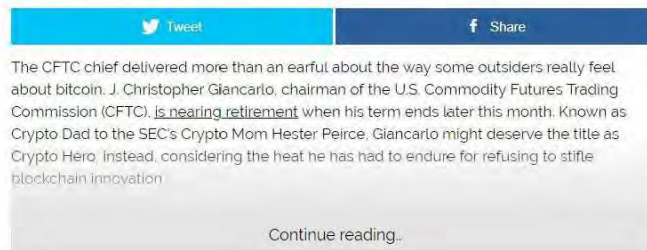


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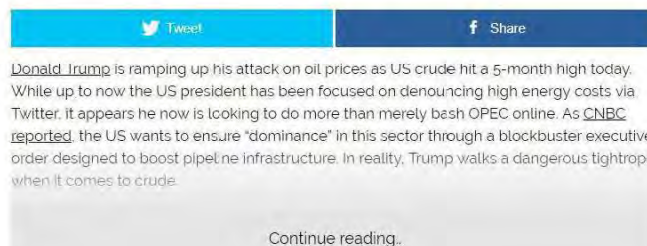
Crypto Hero? Retiring CFTC Chief Bites Back at Anti-Bitcoin Bullies

Gerelyn Terzo 05/04/2019 Crypto News, Regulation, U.S. Market News



Trump Declares War on OPEC, Saudis Laugh as Oil Price Surges

Francois Aure 05/04/2019 News, U.S. Market News



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CNBC's Becky Quick compares investing in bitcoin to the lottery, and a blockchain investor took her to task about the misnomer. | Source: YouTube/Purpose Built Communities

Backlash Builds After CNBC's Becky Quick Ridicules 'Lottery Ticket' Bitcoin

Gerelyn Terzo 05/04/2019 Bitcoin in Media Crypto News

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Nobody has been harder on [bitcoin](#) than the mainstream financial media, particularly during the crypto winter. Now that the market is showing signs of strength, bitcoin is back on their radar, but some continue to miss the point. Among them, CNBC's Becky Quick probably got bitcoin the most wrong.

[Continue reading..](#)



Biden is distancing himself from Barack Obama, but is it too little too late? | Source: AFP PHOTO / NICHOLAS KAMM

Joe Biden: As Groping Claims Bury Ex-VP, Obama Silence Speaks Volumes

Samantha Chang 05/04/2019 News, Politics, U.S., Market News

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Former U.S. Vice President [Joe Biden](#) is being barraged with an avalanche of groping allegations from multiple women. But the curious silence from his longtime pal, ex-President [Barack Obama](#), is deafening.

[Continue reading..](#)



Bernie Sanders' Economic Policy Would Send Population Buying Bitcoin

BITCOIN EVENTS CALENDAR

Blockchain for Finance
Conference, Asia Pacific

Singapore 07.05.2019

Tokenized Assets New York

New York, USA 12.05.2019

Malta AI & Blockchain Summit

St. Julian's, Malta 22.05.2019

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HVY ARTICLES

- 'If I was black': School bans teen from prom over racist sign seeking date
- Channing Tatum Posts Nude Selfie After Losing Game of Jenga
- The 2019 Billboard Music Awards (Song Awards): And The Winner is...
- African Union Issues New Warning to Sudan's Transitional Military Government
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Exhibit G

DAVID B. FECHHEIMER

2005 Lyon Street, San Francisco, California 94115
Office (415) 885-5918
Fax (415) 885-0685

March 29, 2019

Jeffrey M. Rosenfeld
KRONENBERGER ROSENFELD, LLP
150 Post Street, Suite 520
San Francisco, CA 94108

Re.: ISIS AGORA LOVECRUFT

REPORT OF INVESTIGATION

The person using the name Isis Agora Lovecruft may be **Sarah Michelle Reichwein** who was born in [REDACTED] on [REDACTED]. She has SSN [REDACTED].

Commercial data sources list her most recent address as 2261 Market Street, San Francisco, CA 94114. This is a commercial address and post office center called Mail Access, which Reichwein has reportedly used since July of 2018.

Commercial data sources list her address in January of 2019 as 1389 Jefferson Street, Unit C501, Oakland, California 94612. This address is believed to be part of an apartment complex called Domain Oakland.

Her parents, [REDACTED] own and are believed to live at [REDACTED]. There is a homestead property exemption reported against this property.

David B. Fechheimer

DBF/kl

Exhibit H

ATTORNEY (S) NAME & ADDRESS KRONENBERGER ROSENFELD, LLP KARL S. KRONENBERGER (BAR NO. 226112) JEFFREY M. ROSENFELD (BAR NO. 222187) LIANA W. CHEN (BAR NO. 296965) 150 POST STREET, SUITE 520 SAN FRANCISCO, CA 94108 Tel. No.: (415) 955-1155 Fax No.: (415) 955-1158 <i>Attorney(s) for:</i> PLAINTIFF PETER TODD <i>Reference:</i> KRORSF-0003580.TF	FOR COURT USE ONLY
UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
PLAINTIFF/PETITIONER: PETER TODD, an individual DEFENDANT/RESPONDENT: SARAH MICHELLE REICHWEIN aka ISIS AGORA LOVECRUFT, an individual	
DECLARATION OF DILIGENCE	CASE No.: 3:19-cv-01751

I, RAUL DELEON, declare that I have personal, first hand knowledge of the following facts, and if called and sworn as a witness, I can and will testify competently thereto. I and any employees or agents retained by **EXPRESS NETWORK, 1605 W. OLYMPIC BLVD., #800, LOS ANGELES, CA 90015 (213) 975-9850**, are and were on the dates mentioned herein over the age of 18 years and not a party to this action.

On **APRIL 4, 2019**, EXPRESS NETWORK, received the following document(s): SUMMONS IN A CIVIL ACTION; COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES DEMAND FOR JURY TRIAL; CIVIL COVER SHEET; PLAINTIFF PETER TODD'S CERTIFICATION OF INTERESTED ENTITIES OR PERSONS; ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES; NOTICE OF ASSIGNMENT OF CASE TO A UNITED STATES MAGISTRATE JUDGE FOR TRIAL; (BLANK) CONSENT OR DECLINATION TO MAGISTRATE JUDGE JURISDICTION; CONSENTING TO THE JURISDICTION OF A MAGISTRATE JUDGE PACKET; STANDING ORDER FOR MAGISTRATE JUDGE DONNA M. RYU; (BLANK) NOTICE OF SETTLEMENT CONFERENCE AND SETTLEMENT CONFERENCE ORDER; NOTICE RE TELEPHONIC APPEARANCE PROCEDURES FOR MAGISTRATE JUDGE DONNA M. RYU; STANDING ORDER FOR ALL JUDGES OF THE NORTHERN DISTRICT OF CALIFORNIA CONTENTS OF JOINT CASE MANAGEMENT STATEMENT; ECF REGISTRATION INFORMATION; FILING PROCEDURES (OAKLAND); (BLANK) NOTICE OF LAWSUIT AND REQUEST TO WAIVE SERVICE OF SUMMONS; (BLANK) WAIVER OF THE SERVICE OF SUMMONS; . to be served on SARAH MICHELLE REICHWEIN aka ISIS AGORA LOVECRUFT, an individual, at the following address:

ATTEMPTED SERVICE AT: 1389 JEFFERSON STREET, UNIT C501, OAKLAND, CA 94612

04-04-2019 AT 9:02PM	LOCATED UNIT C501
04-04-2019 AT 9:02PM	NO ANSWER AT THE UNIT; NEIGHBORS DID NOT ANSWER.
04-05-2019 AT 9:50AM	SPOKE WITH THE LEASING OFFICE WHO SAID THAT THEY DO NOT HAVE THE DEFENDANT AS A RESIDENT. THE SERVER SHOWED THE SUBJECTS PHOTO AND THE LEASING OFFICE SAID THEY HAD NEVER SEEN HER. THAT THEY KNOW THE TENANTS. THAT THERE ARE NEW RESIDENTS IN THE UNIT.

Person serving:
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Express Network
P.O. Box 861057
Los Angeles, California 90086
(213) 975-9850

Registered California Process Server
(1) Employee or Independent Contractor
(2) Registration No.: 1202
(3) County: SANTA CLARA

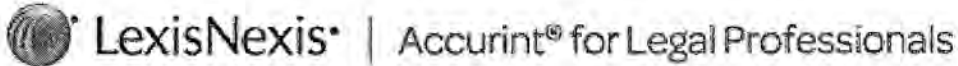
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: APRIL 9, 2019

DECLARATION OF DILIGENCE

Exhibit I

Comprehensive Report



Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

Accurint does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, Accurint may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.

Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings


Your GLBA Permissible Use: Use by Persons Holding a Legal or Beneficial Interest Relating to the Consumer

Your DMF Permissible Use: No Permissible Purpose

Comprehensive Report

Date: 03/29/19

Report Legend:

- Shared Address
-  - Deceased
- Probable Current Address

Report processed by:

KRONENBERGER ROSENFELD, LLP
150 POST ST STE 520
SAN FRANCISCO, CA 94108
415-955-1155 Main Phone
415-955-1158 Fax

Subject Information

(Best Information for Subject)

Name: SARAH M REICHWEIN

Date of Birth: REDACTED

Age: R

SSN: REDACTED issued in California between REDACTED

AKAs

(Names Associated with Subject)

SARAH M REICHWEIN

Age: R SSN: REDACTED

SARAH REICHWEIN

SSN: REDACTED

Indicators

Bankruptcy: No
Property: No
Corporate Affiliations: No

Comprehensive Report Summary:

Bankruptcies:

None Found

Liens and Judgments:

None Found

UCC Filings:

None Found

Phones Plus:

1 Found

People at Work:

None Found

Driver's License:

None Found

Address(es) Found:

0 Verified and 7 Non-Verified Found

Possible Properties Owned:

None Found

Motor Vehicles Registered:

None Found

Comprehensive Report

Watercraft:

None Found

FAA Certifications:

None Found

FAA Aircrafts:

None Found

Possible Criminal Records:

1 Found

Sexual Offenses:

None Found

Professional Licenses:

None Found

Voter Registration:

None Found

Hunting/Fishing Permit:

None Found

Concealed Weapons Permit:

None Found

Possible Associates:

None Found

DEA Controlled Substances:

None Found

Possible Relatives:

1st Degree - 8 Found

2nd Degree - 11 Found

3rd Degree - None Found

Neighbors:

1st Neighborhood - 2 Found

2nd Neighborhood - 4 Found

3rd Neighborhood - 3 Found

4th Neighborhood - 1 Found

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

[None Found]

Address Summary:

2261 MARKET ST, SAN FRANCISCO, CA 94114-1600, SAN FRANCISCO COUNTY (Jul 2018 - Mar 2019)

REDACTED

1389 JEFFERSON ST UNIT C501, OAKLAND, CA 94612-1698, ALAMEDA COUNTY (Jan 2019)

REDACTED

Active Address(es):

[None Found]

Previous And Non-Verified Address(es):

2261 MARKET ST, SAN FRANCISCO, CA 94114-1600, SAN FRANCISCO COUNTY (Jul 2018 - Mar 2019)

Name Associated with Address:

SARAH REICHWEIN

Property Ownership Information for this Address

Property:

Parcel Number - 3559-016

Page - 327

Owner Name: PACIFIC UNION PROPERTY MGMT

Owner Name 2: RICHARD A SOLLITTO

Property Address: - 2261 MARKET ST, SAN FRANCISCO, CA 94114-1600, SAN FRANCISCO COUNTY

Sale Date - 08/28/2006

Comprehensive Report

Sale Price - \$1,825,000
Assessed Value - \$2,456,188
Land Size - 3,497 Square Feet
Year Built - 1900
Seller Name: WILLIAM A GRAVITT
Legal Description - MAP B2 10
Loan Amount - \$1,186,250
Loan Type - CONVENTIONAL
Lender Name - FIRST REPUBLIC BK
Data Source - A

Neighborhood Profile (2010 Census)

Average Age: 44
Median Household Income: \$92,708
Median Owner Occupied Home Value: \$748,656
Average Years of Education: 15

REDACTED

1389 JEFFERSON ST UNIT C501, OAKLAND, CA 94612-1698, ALAMEDA COUNTY (Jan 2019)

Name Associated with Address:

SARAH M REICHWEIN

Property Ownership Information for this Address

Property:

Parcel Number - 35-417320-18-000-00-01-00
Owner Name: PARIS BAGUETTE AMERICA INCORPORATED
Property Address: - 1389 JEFFERSON ST, OAKLAND, CA 94612-1594, ALAMEDA COUNTY
Owner Address: 6100 S MALT AVE, COMMERCE, CA 90040-3508, LOS ANGELES COUNTY
Assessed Value - \$383,629
Data Source - B

Neighborhood Profile (2010 Census)

Average Age: 39
Median Household Income: \$21,183
Median Owner Occupied Home Value: \$447,692
Average Years of Education: 12

REDACTED

Comprehensive Report

REDACTED



Comprehensive Report

REDACTED

Bankruptcies:

[None Found]

Liens and Judgments:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

Name: REICHWEIN, SARAH

Address: REDACTED

Phone Number: REDACTED

Phone Type: Mobile

Carrier: SPRINT SPECTRUM LP - (ANAHEIM, CA)

People at Work:

Maximum 50 People at Work records returned

[None Found]

Driver's License Information:

[None Found]

Possible Properties Owned by Subject:

[None Found]

Motor Vehicles Registered To Subject:

[None Found]

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

California Court:

Name: SARAH MICHELLE REICHWEIN

SSN: REDACTED

Comprehensive Report

State of Origin: California
County of Origin: REDACTED
DOB: REDACTED
Case Number: REDACTED
Case Type Description: NON-CRIMINAL

Offenses:

Offense #1

Court Case Number: REDACTED
Court Offense: CITATION
Court Disposition: Status: CASE DISPOSED REDACTED
Court Disposition Date: REDACTED
Court Level/Degree: INFRACTION

Court Activity:

[NONE FOUND]

Sexual Offenses:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

[None Found]

Hunting/Fishing Permit:

[None Found]

Concealed Weapons Permit:

[None Found]

Firearms and Explosives:

[None Found]

DEA Controlled Substances:

[None Found]

Possible Associates:

[None Found]

Possible Relative Summary:

REDACTED



RE

Comprehensive Report

REDACTED

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Comprehensive Report

[illegible]

Possible Relatives:

REDACTED

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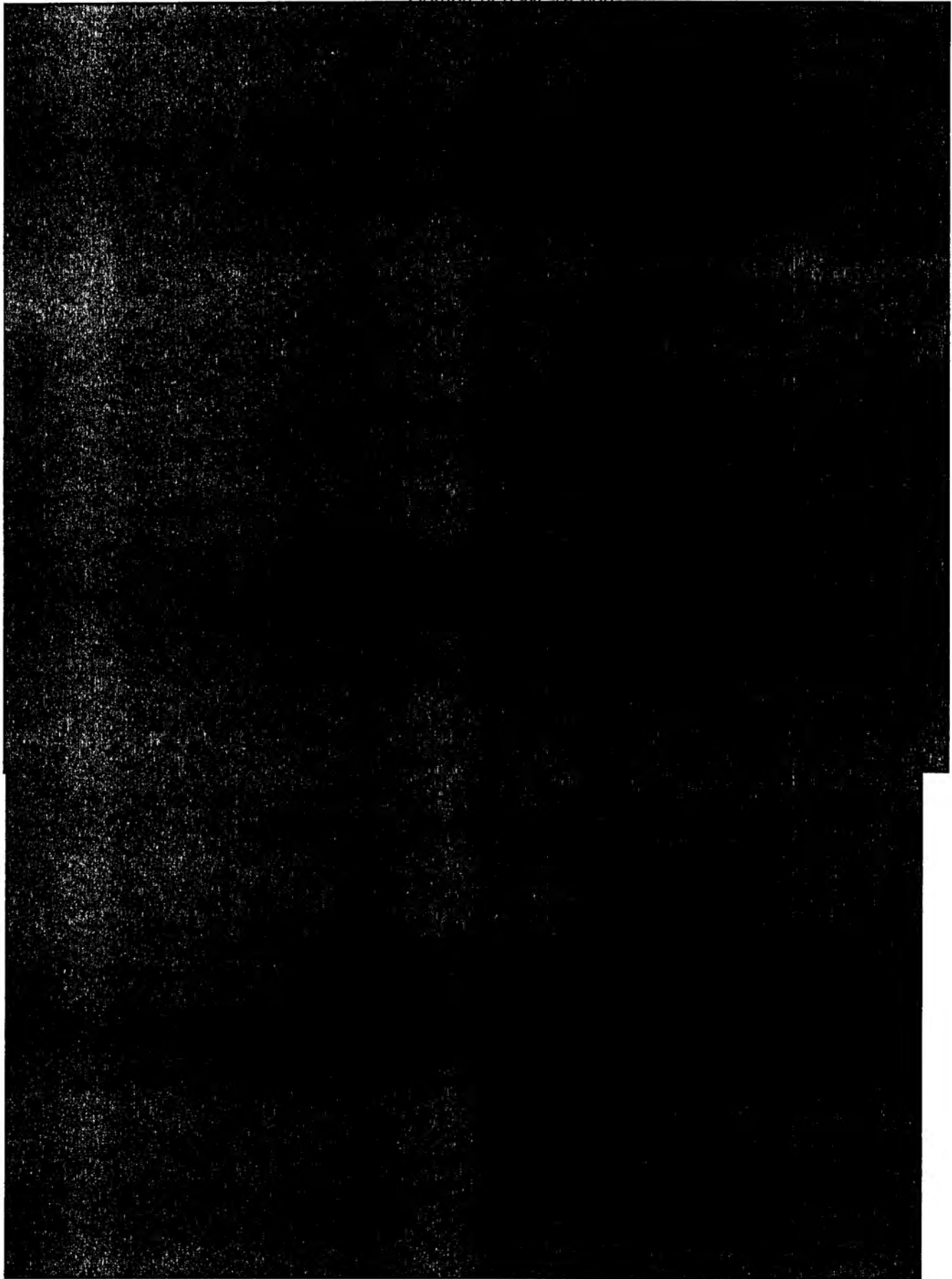
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Comprehensive Report

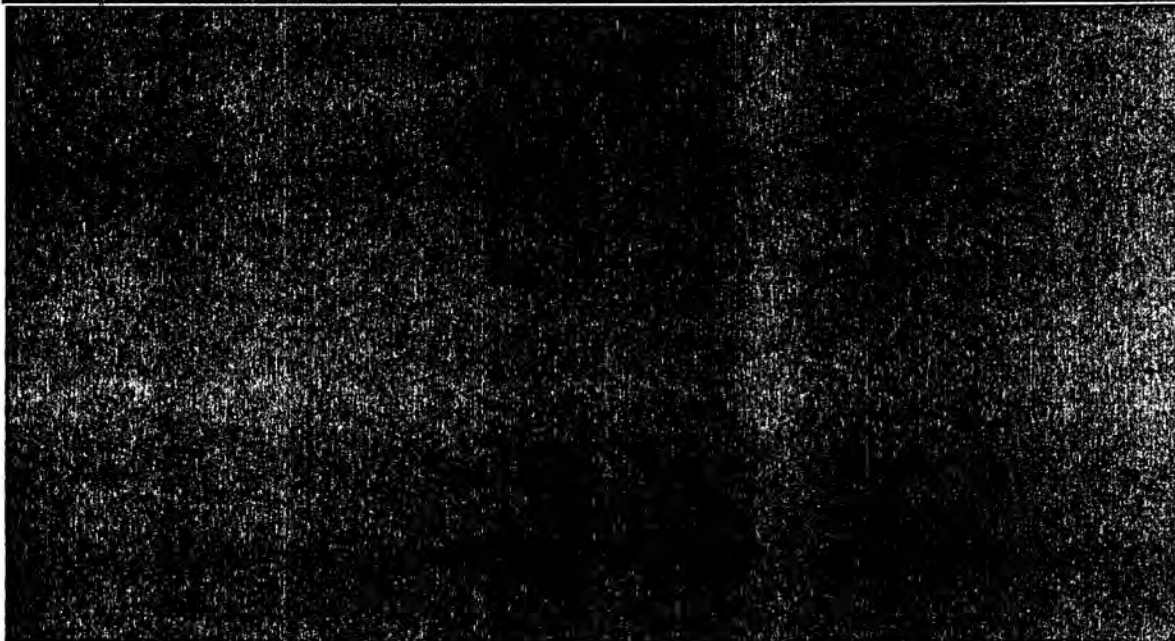
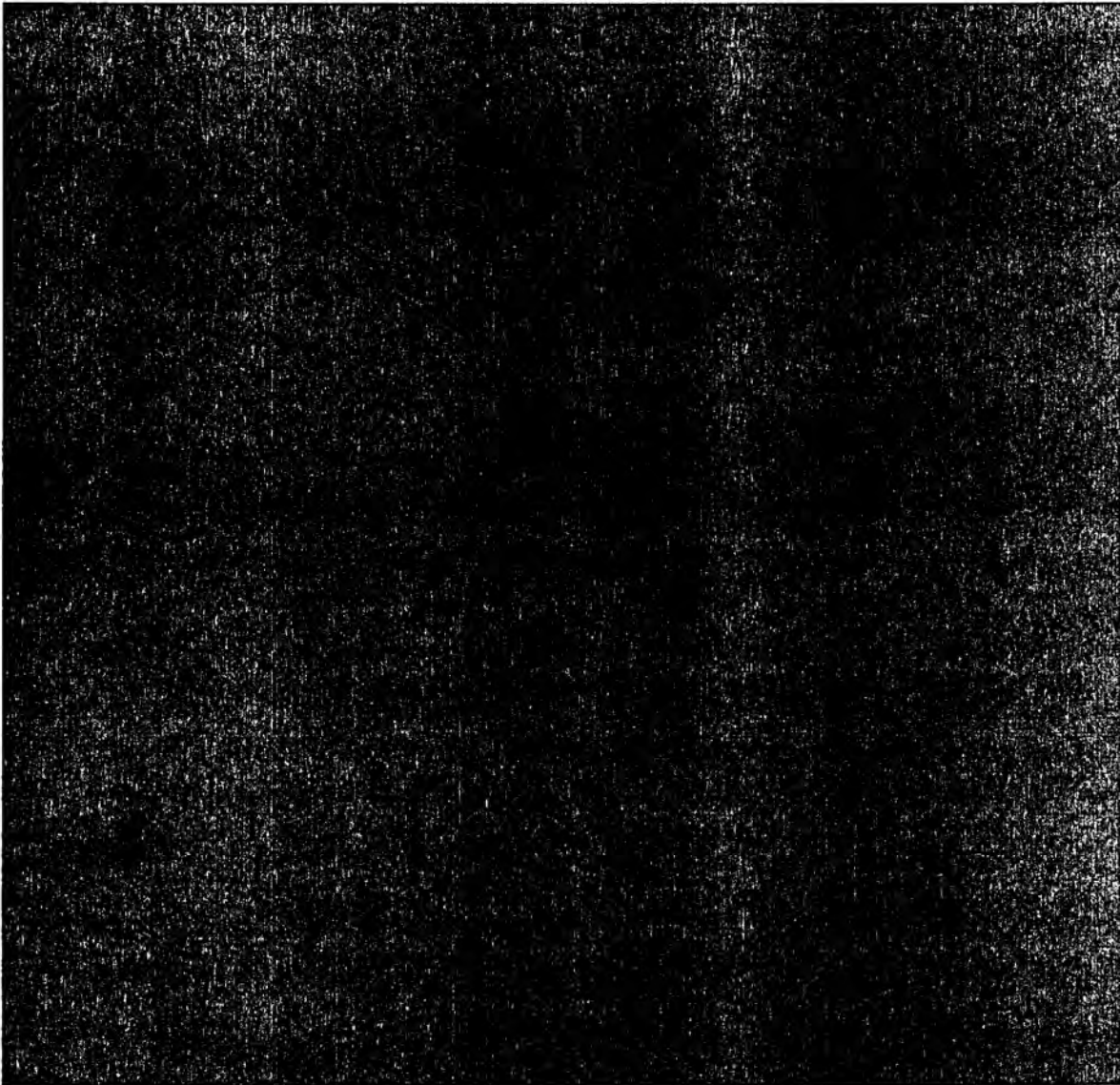
REDACTED

A large, irregular black redaction box covers the majority of the page's content. It starts below the 'Comprehensive Report' header and extends down to just above the footer. The redaction is composed of several horizontal bars of varying lengths, creating a jagged, stepped appearance on the right side. The word 'REDACTED' is printed in white capital letters in the top-left corner of this blacked-out area.

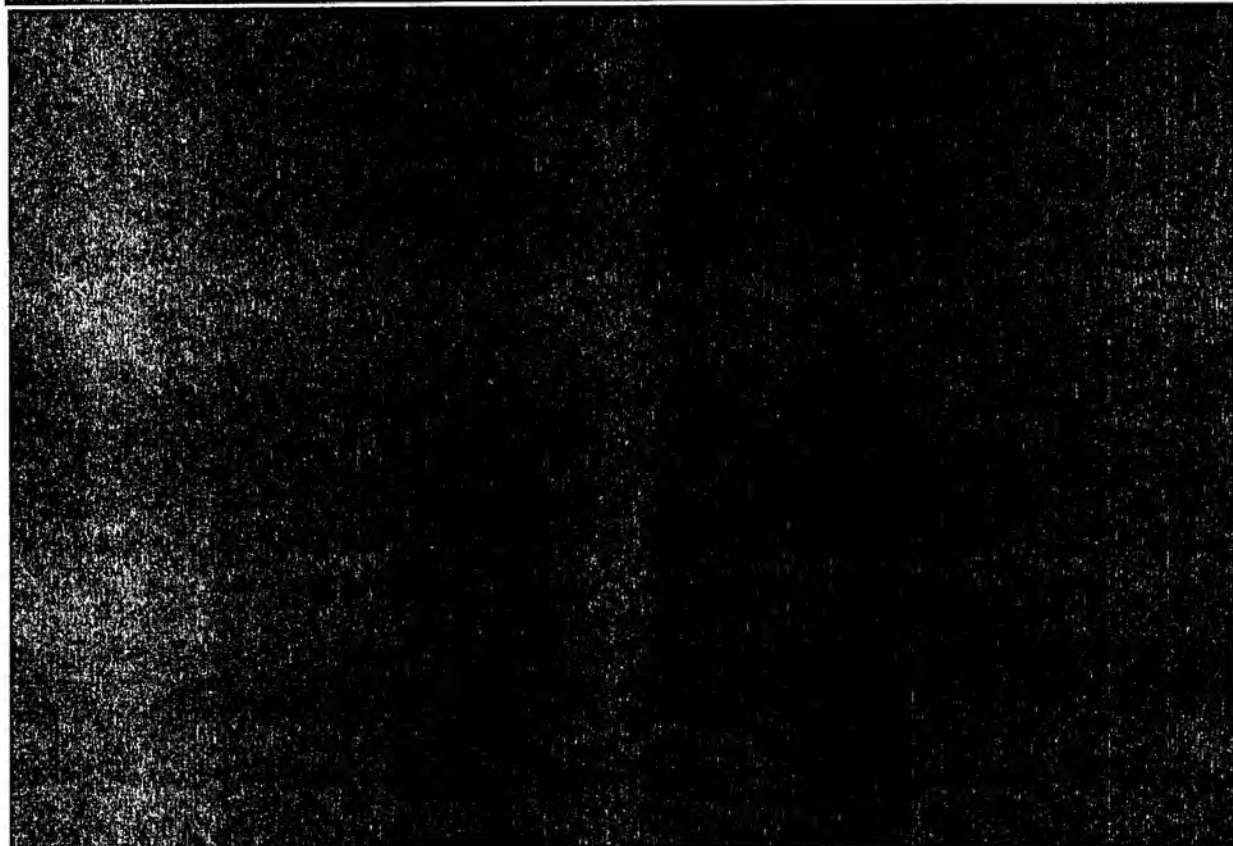
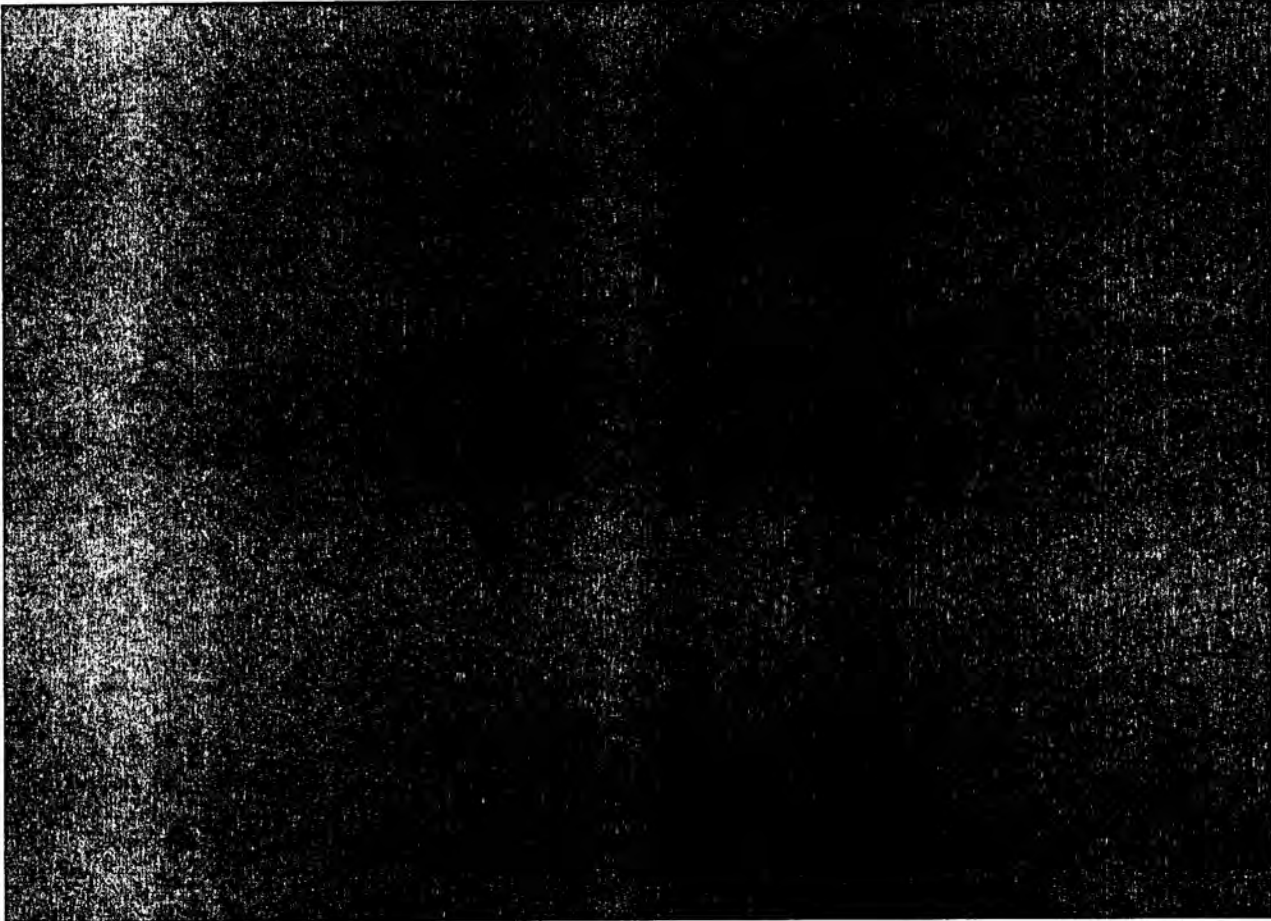
Comprehensive Report



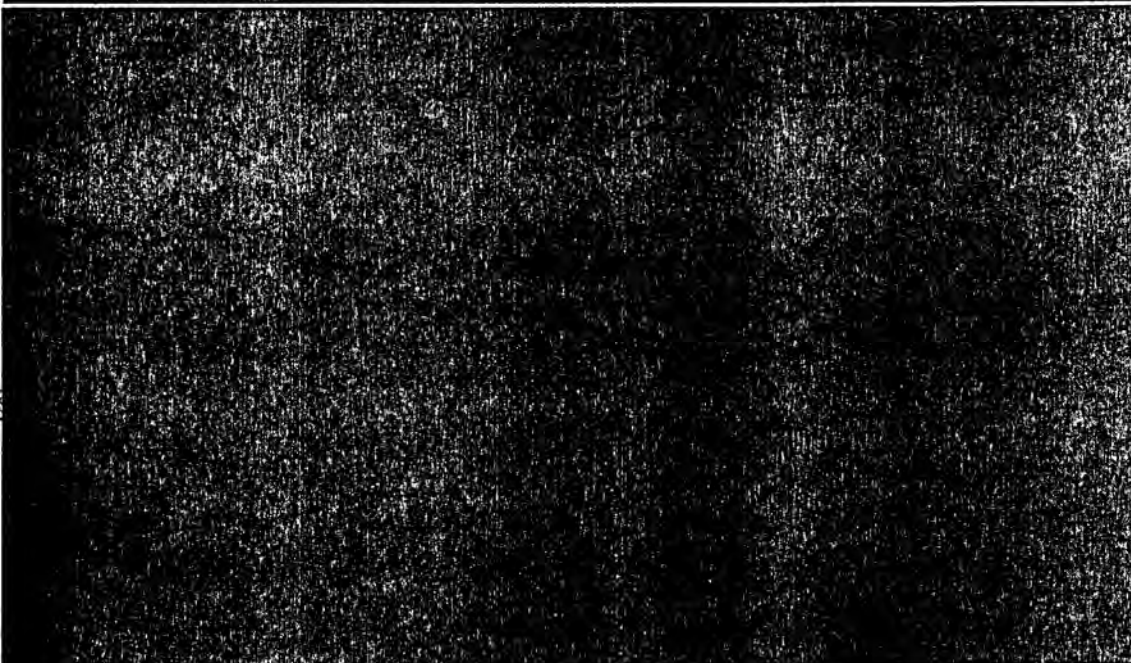
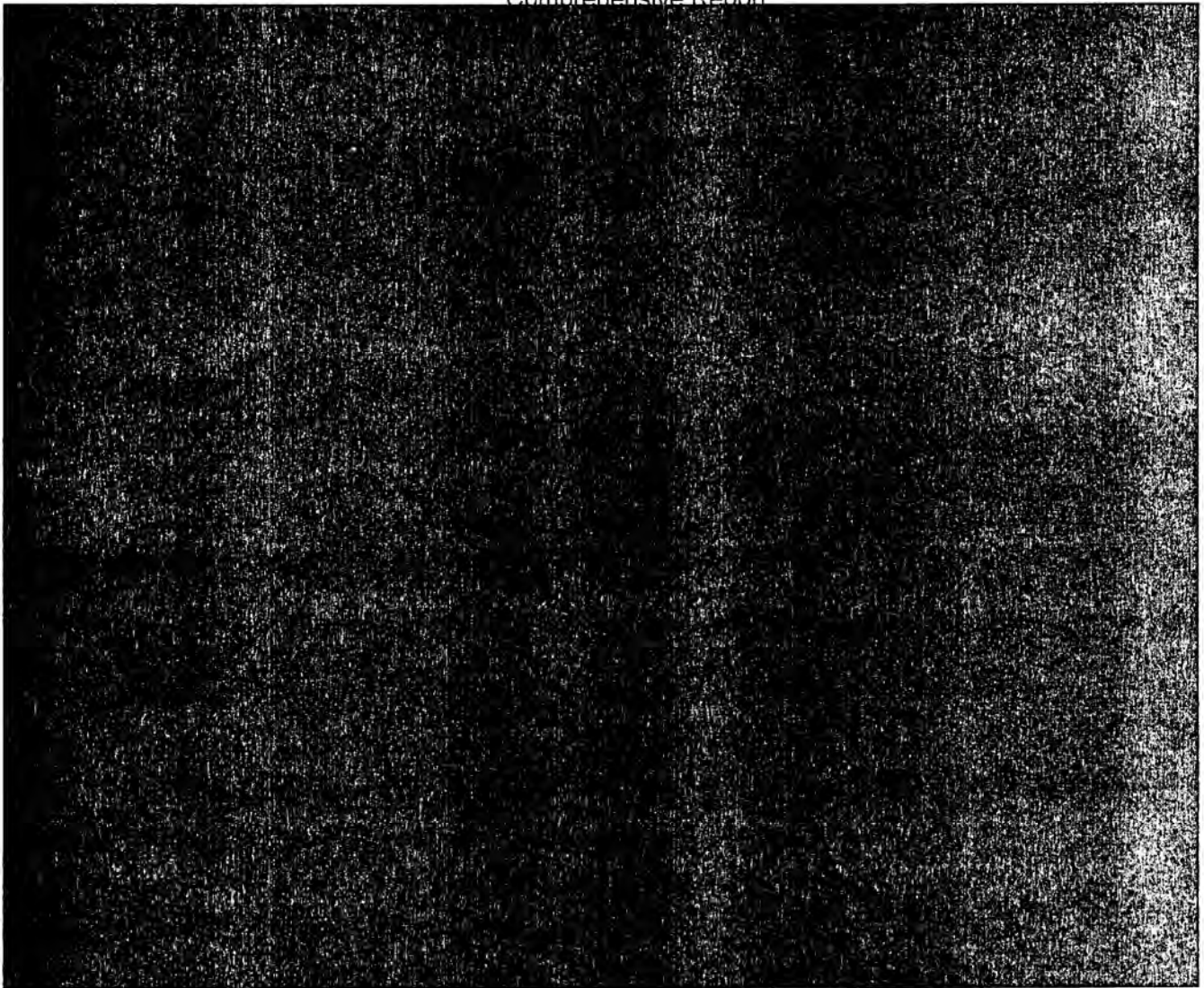
Comprehensive Report



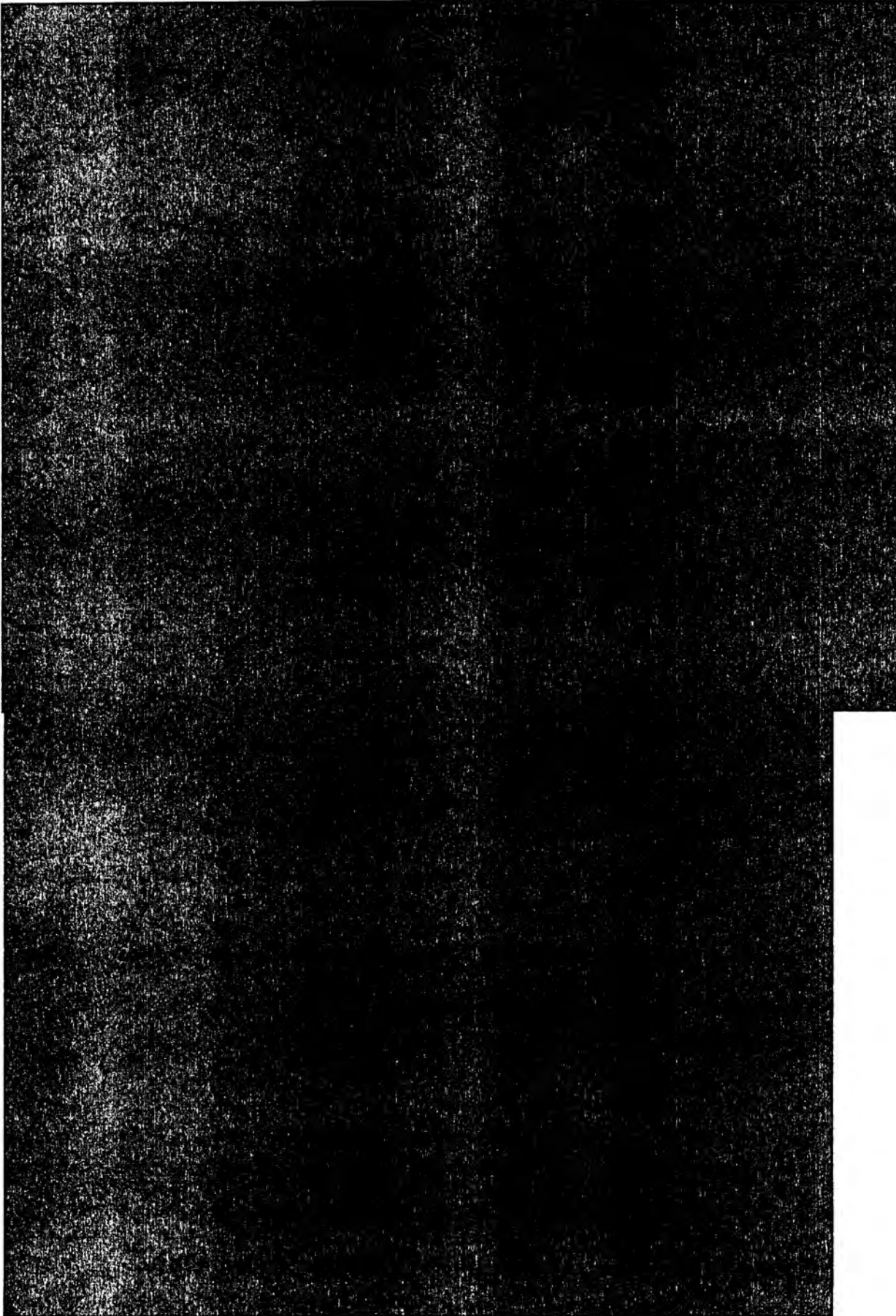
Comprehensive Report



Comprehensive Report

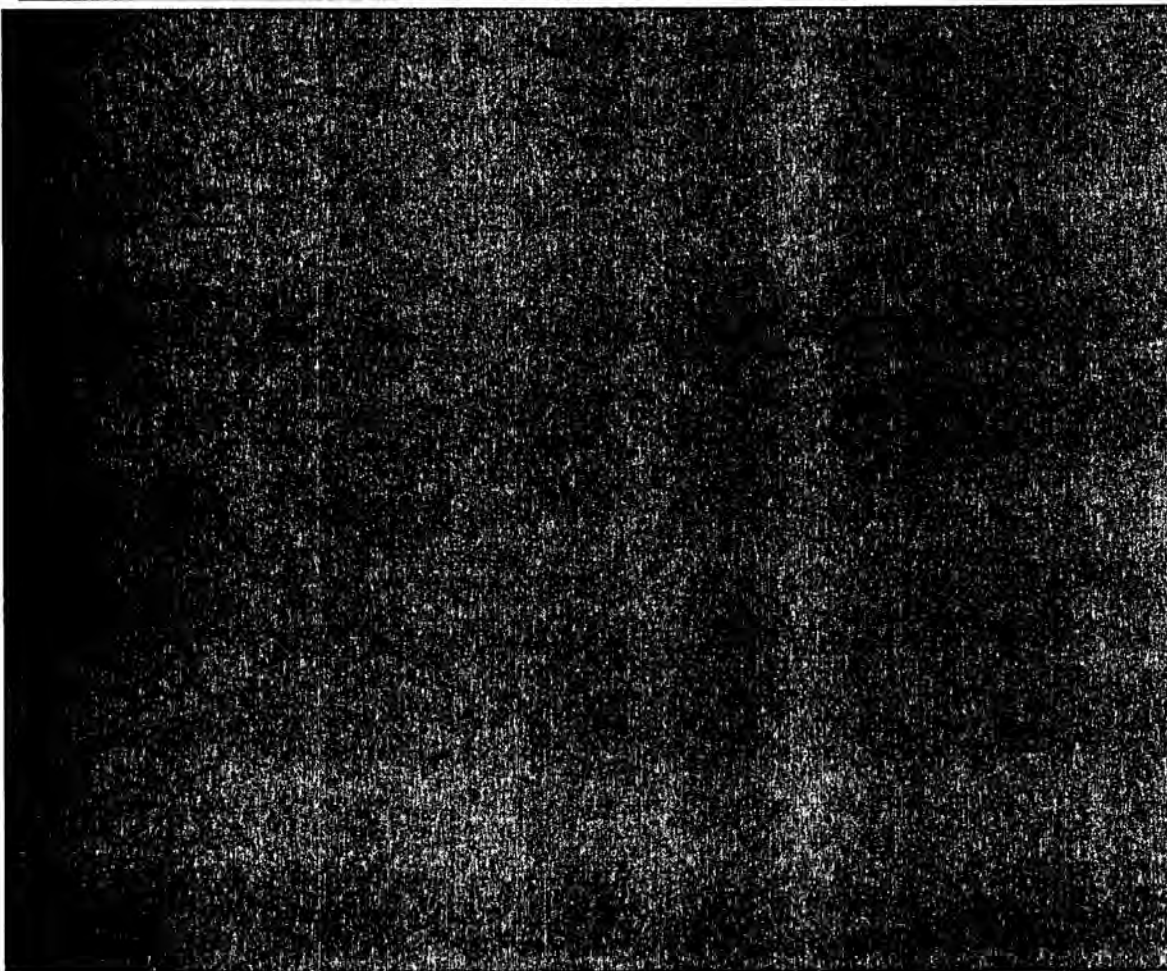
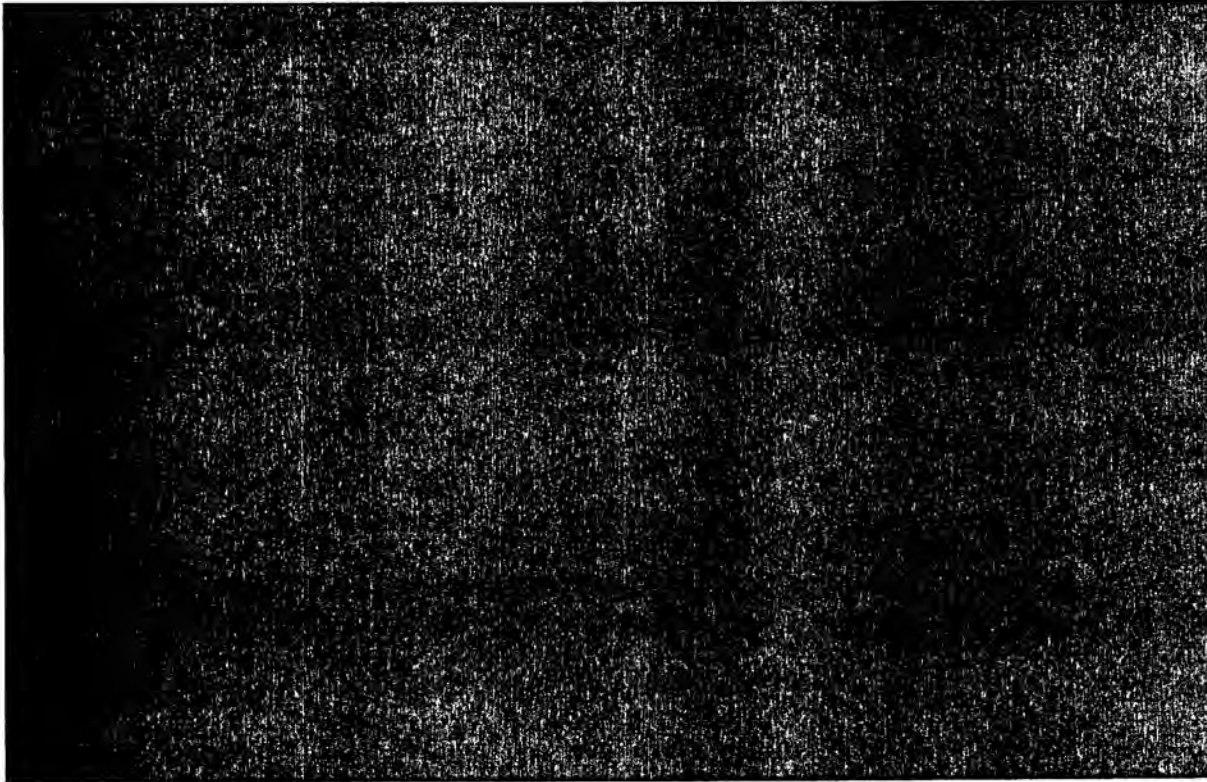


Comprehensive Report

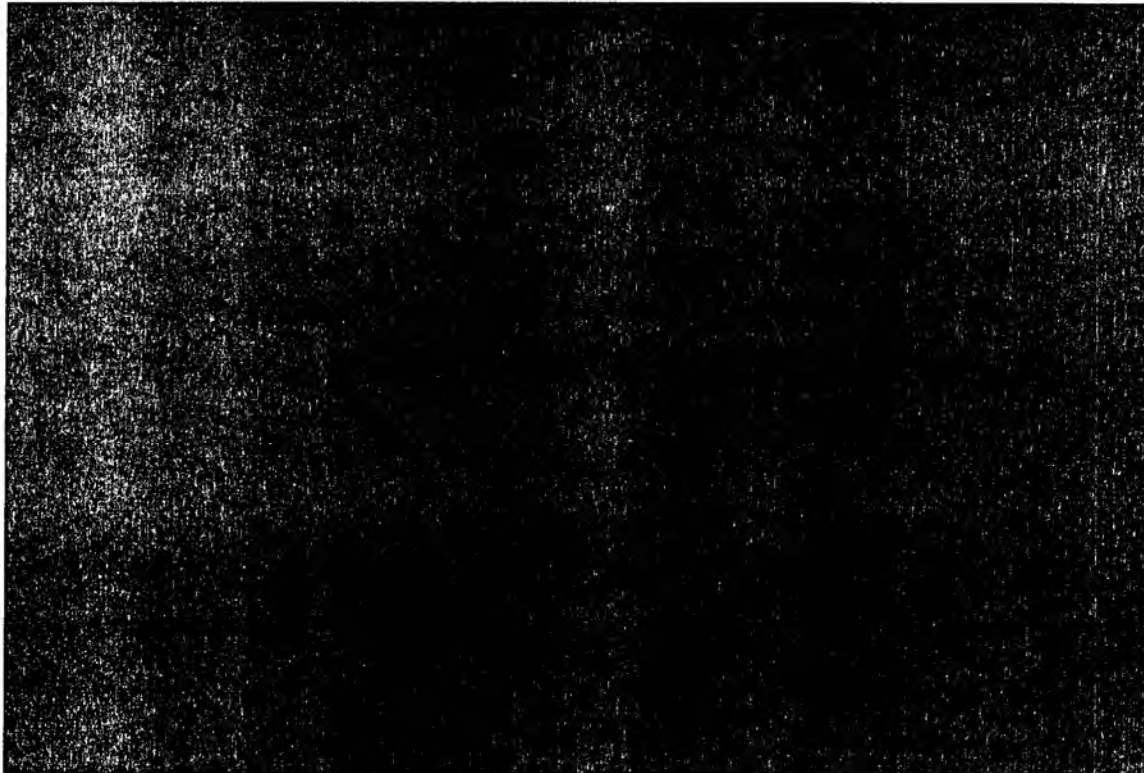
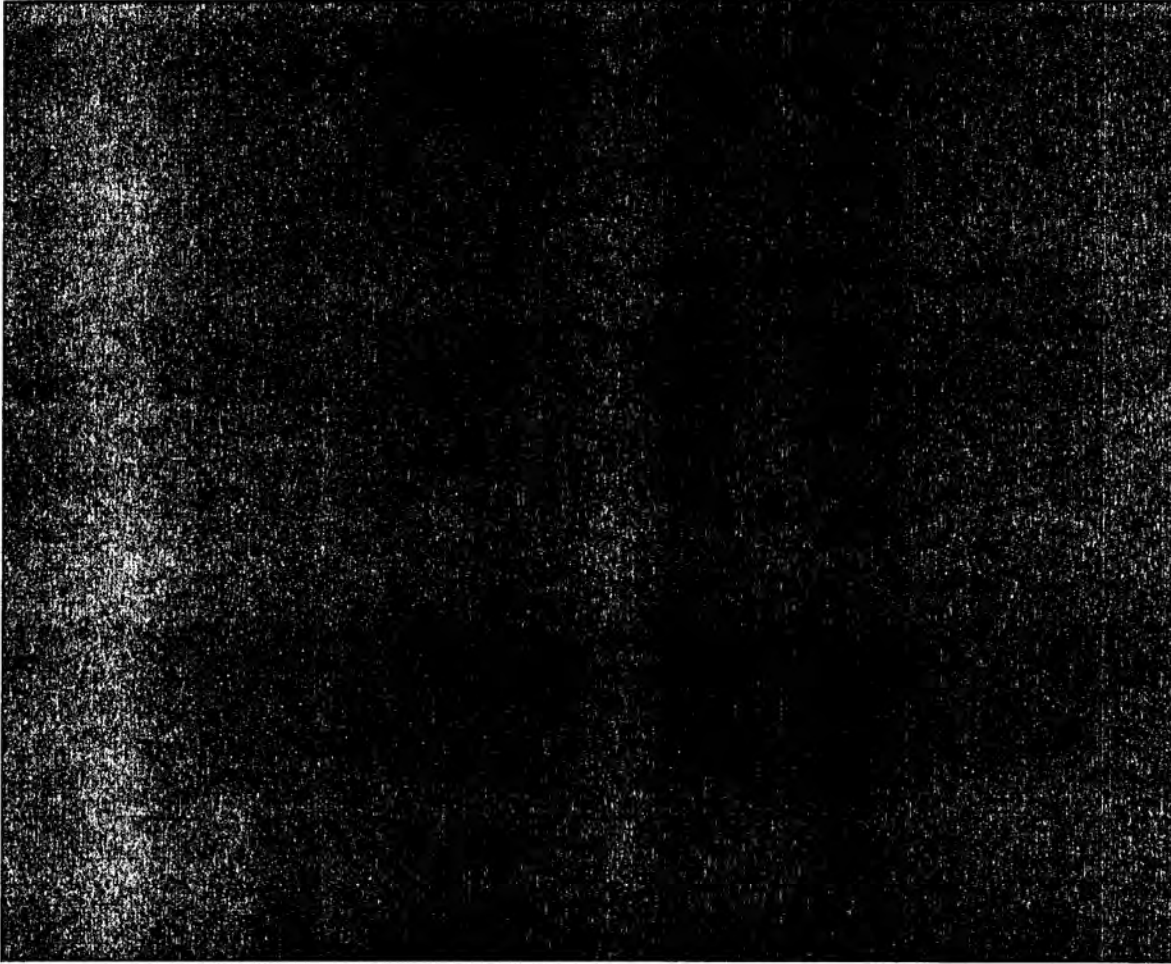


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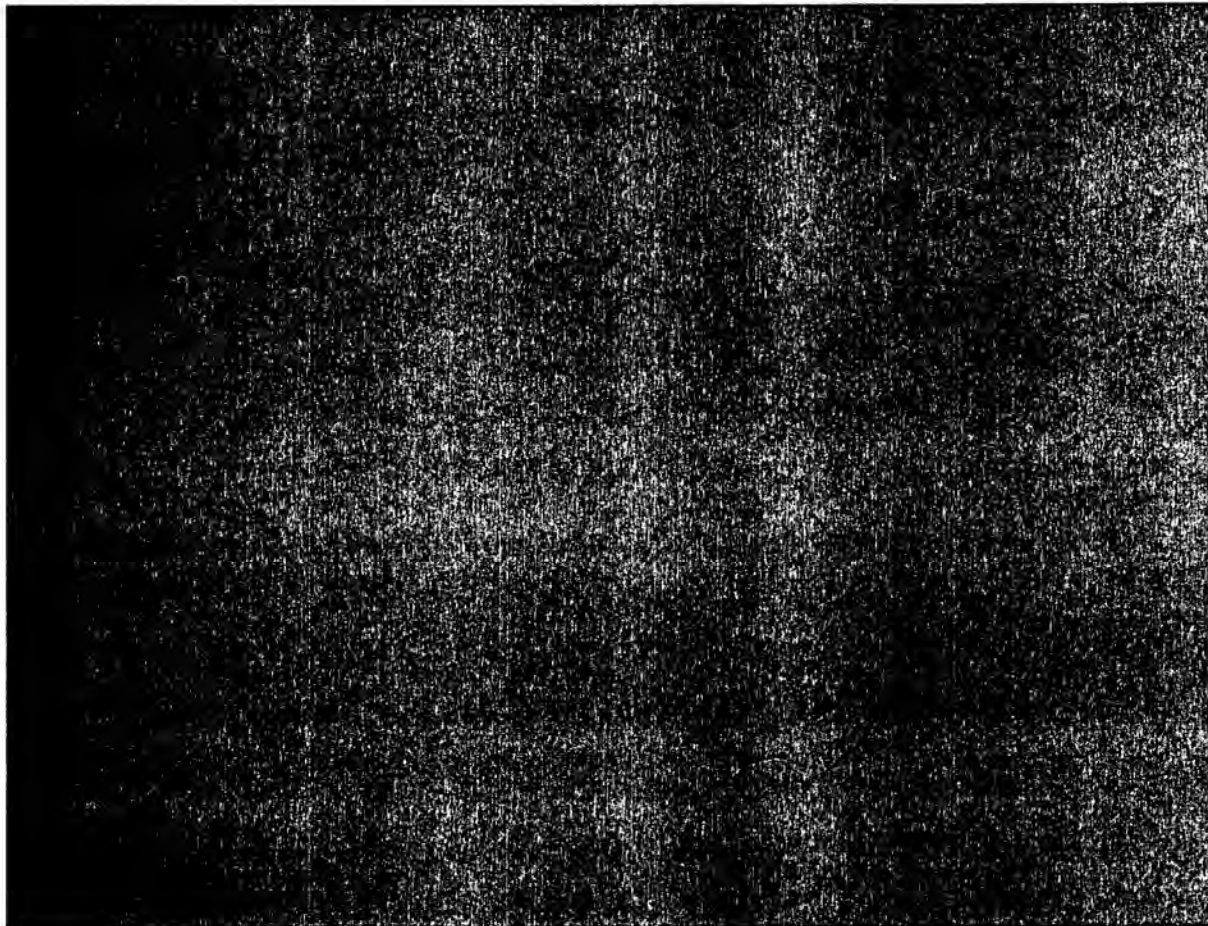
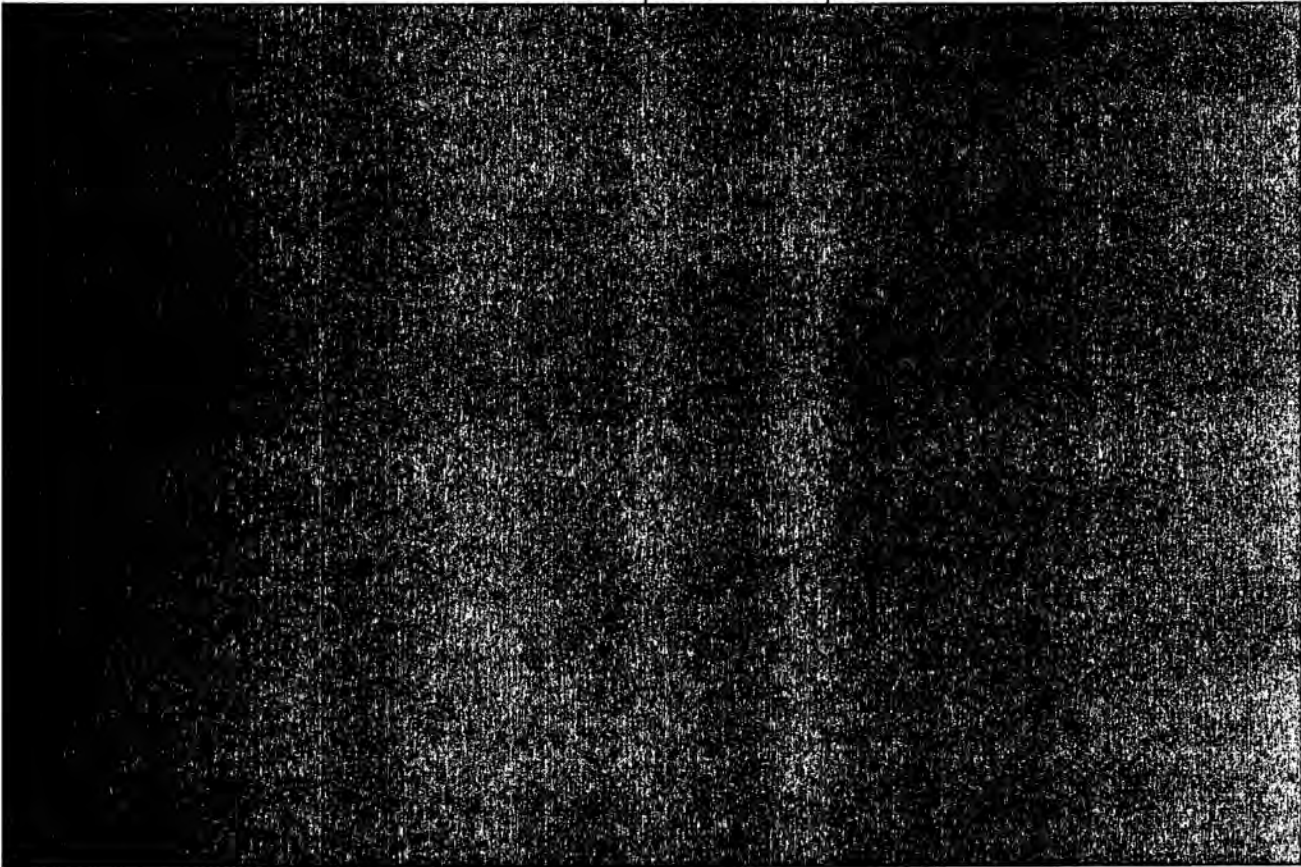
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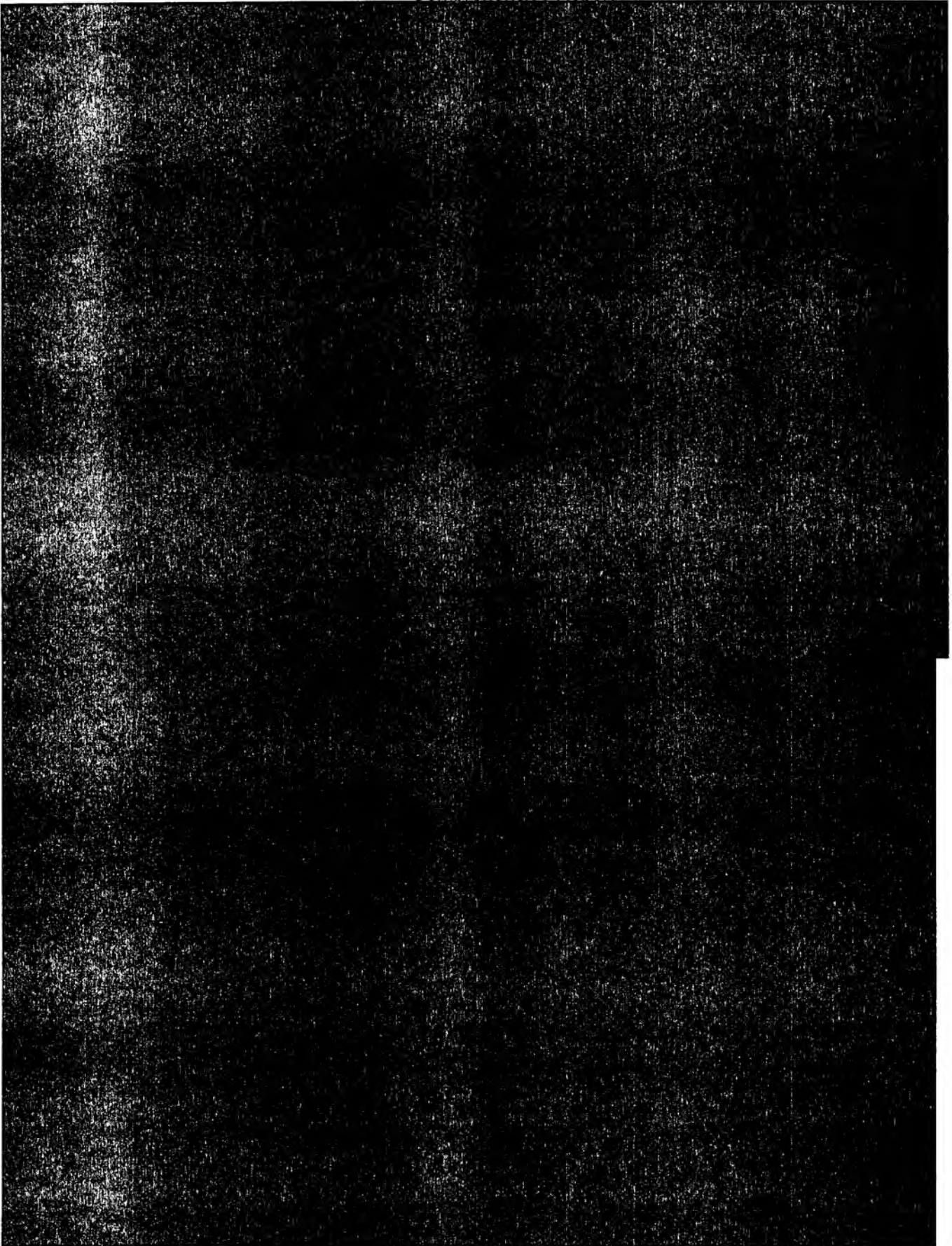
Comprehensive Report



Comprehensive Report



Comprehensive Report



Comprehensive Report

REDACTED



Neighbors:

Neighborhood:

2261 MARKET ST, SAN FRANCISCO, CA 94114-1600, SAN FRANCISCO COUNTY (Jul 2018 - Mar 2019)

Address(es):

REDACTED



Comprehensive Report

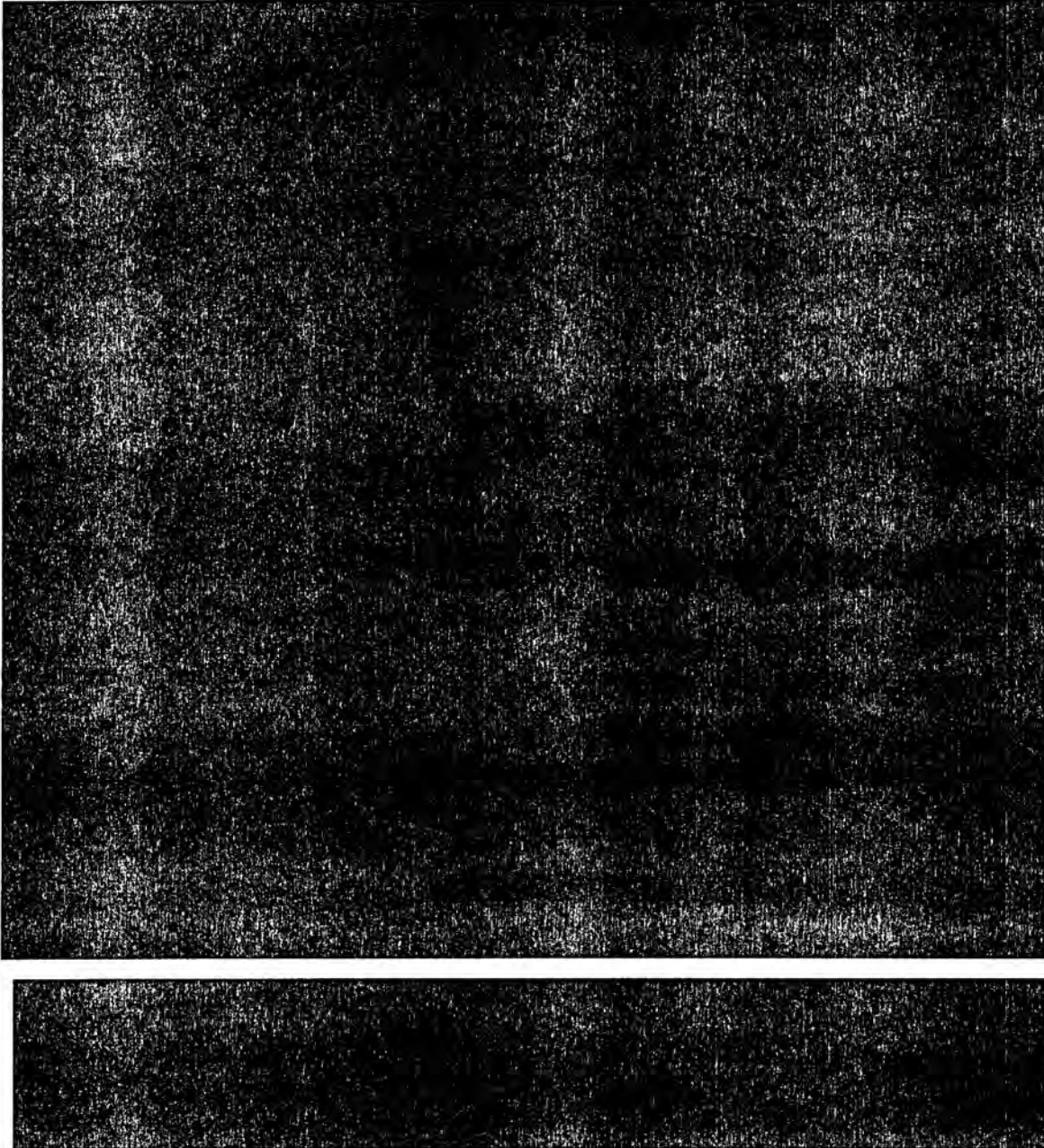


Exhibit J

Comprehensive Report



LexisNexis® | Accurint® for Legal Professionals

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

Accurint does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, Accurint may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.

Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings

Your GLBA Permissible Use: Use by Persons Holding a Legal or Beneficial Interest Relating to the Consumer

Your DMF Permissible Use: No Permissible Purpose

Comprehensive Report

Date: 04/02/19

Reference Code: Todd, peter

Report Legend:

- Shared Address
- Deceased
- Probable Current Address

Report processed by:

KRONENBERGER ROSENFELD, LLP
150 POST ST STE 520
SAN FRANCISCO, CA 94108
415-955-1155 Main Phone
415-955-1158 Fax

Subject Information

(Best Information for Subject)

Name: NICOLE J APTEKAR

Date of Birth: REDACTED

Age: R

SSN: REDACTED issued in RED, between

REDACTED

AKAs

(Names Associated with Subject)

[No Data Available]

Indicators

Bankruptcy: No

Property: No

Corporate Affiliations: Yes

Comprehensive Report Summary:

Bankruptcies:

None Found

Liens and Judgments:

None Found

UCC Filings:

None Found

Phones Plus:

4 Found

People at Work:

8 Found

Driver's License:

None Found

Address(es) Found:

0 Verified and 8 Non-Verified Found

Possible Properties Owned:

None Found

Motor Vehicles Registered:

Comprehensive Report

None Found
Watercraft:
None Found
FAA Certifications:
None Found
FAA Aircrafts:
None Found
Possible Criminal Records:
None Found
Sexual Offenses:
None Found
Professional Licenses:
None Found
Voter Registration:
None Found
Hunting/Fishing Permit:
None Found
Concealed Weapons Permit:
None Found
Possible Associates:
6 Found
DEA Controlled Substances:
None Found
Possible Relatives:
1st Degree - 4 Found
2nd Degree - 5 Found
3rd Degree - 10 Found
Neighbors:
1st Neighborhood - 1 Found
2nd Neighborhood - 2 Found
3rd Neighborhood - 3 Found

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

REDACTED

Address Summary:

609 PRECITA AVE, SAN FRANCISCO, CA 94110-4819, SAN FRANCISCO COUNTY (Dec 2018 - Mar 2019)

Utility Locator - Connect Date: 12/17/2018

REDACTED

Active Address(es):

[None Found]

Previous And Non-Verified Address(es):

609 PRECITA AVE, SAN FRANCISCO, CA 94110-4819, SAN FRANCISCO COUNTY (Dec 2018 - Mar 2019)

Utility Locator - Connect Date: 12/17/2018

Name Associated with Address:

NICOLE J APTEKAR

Current Residents at Address:

REDACTED

Comprehensive Report

REDACTED



Comprehensive Report

REDACTED
REDACTED



Comprehensive Report

REDACTED

Bankruptcies:

[None Found]

Liens and Judgments:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

Phones Plus1

REDACTED

People at Work:

Maximum 50 People at Work records returned

Name: NICOLE APTEKAR

REDACTED

Comprehensive Report

REDACTED



Driver's License Information:
[None Found]

Possible Properties Owned by Subject:
[None Found]

Comprehensive Report

Motor Vehicles Registered To Subject:

[None Found]

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

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Hunting/Fishing Permit:

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Concealed Weapons Permit:

[None Found]

Firearms and Explosives:

[None Found]

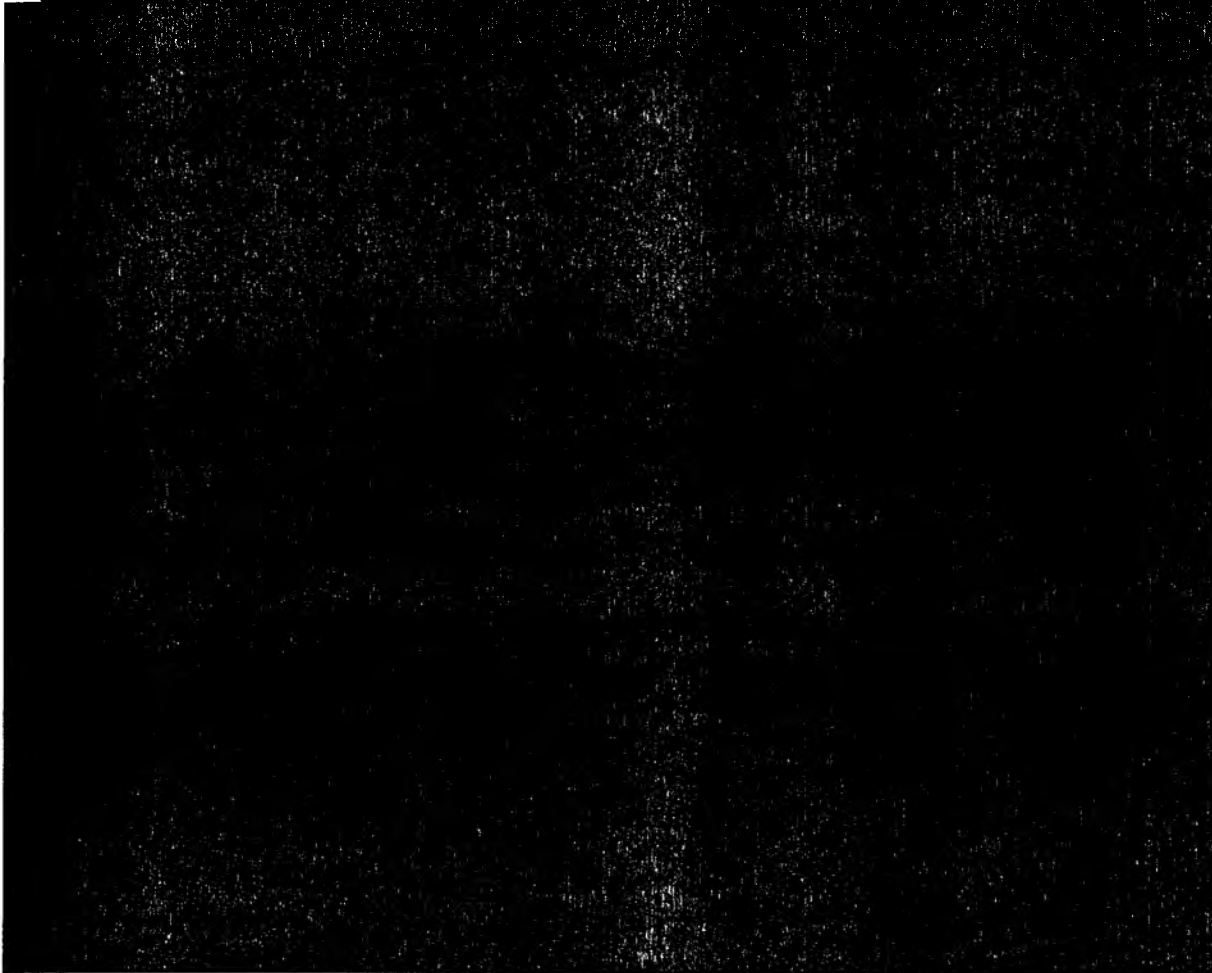
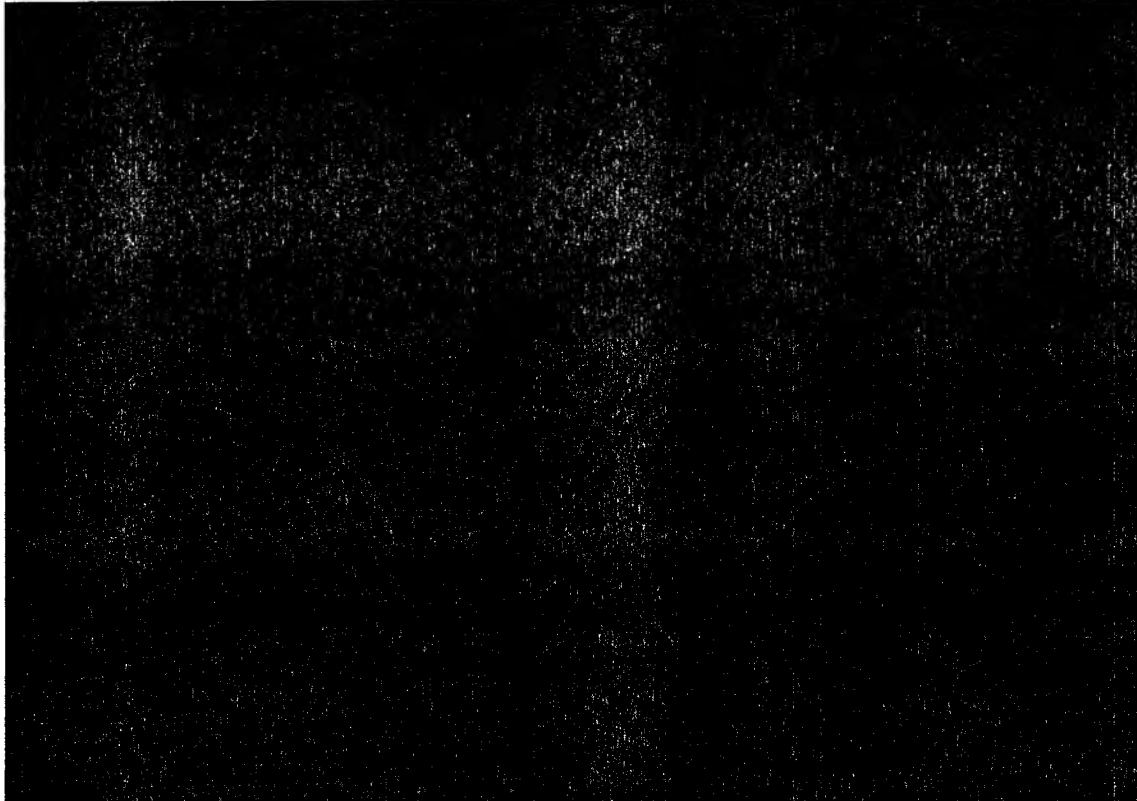
DEA Controlled Substances:

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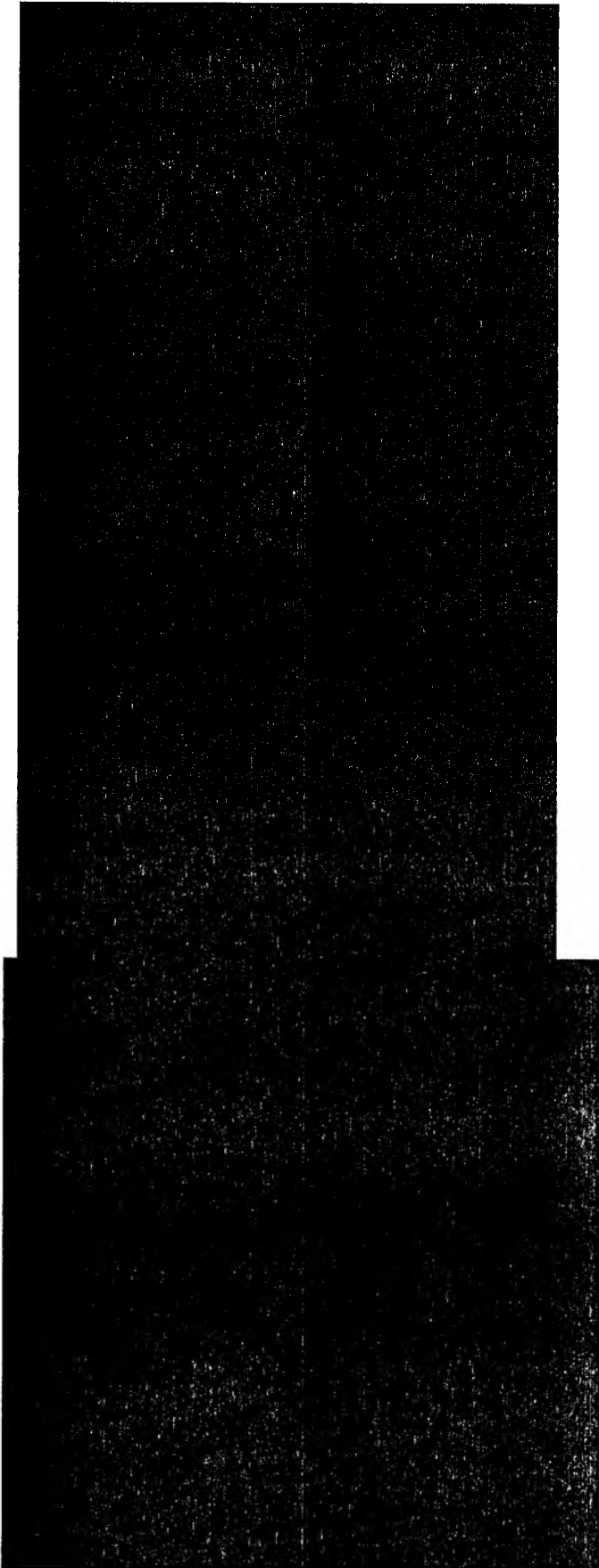
Possible Associates:



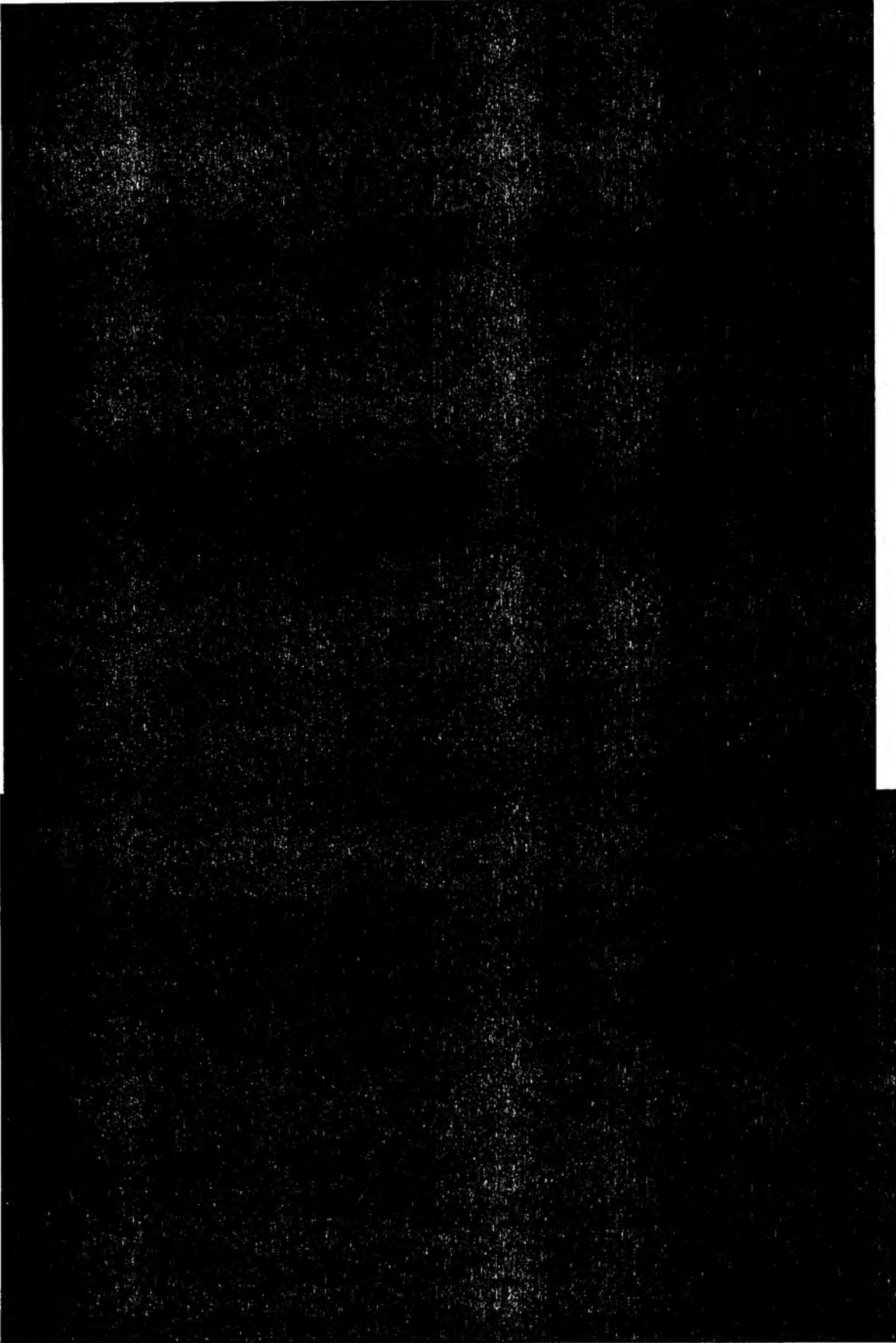
Comprehensive Report



Comprehensive Report



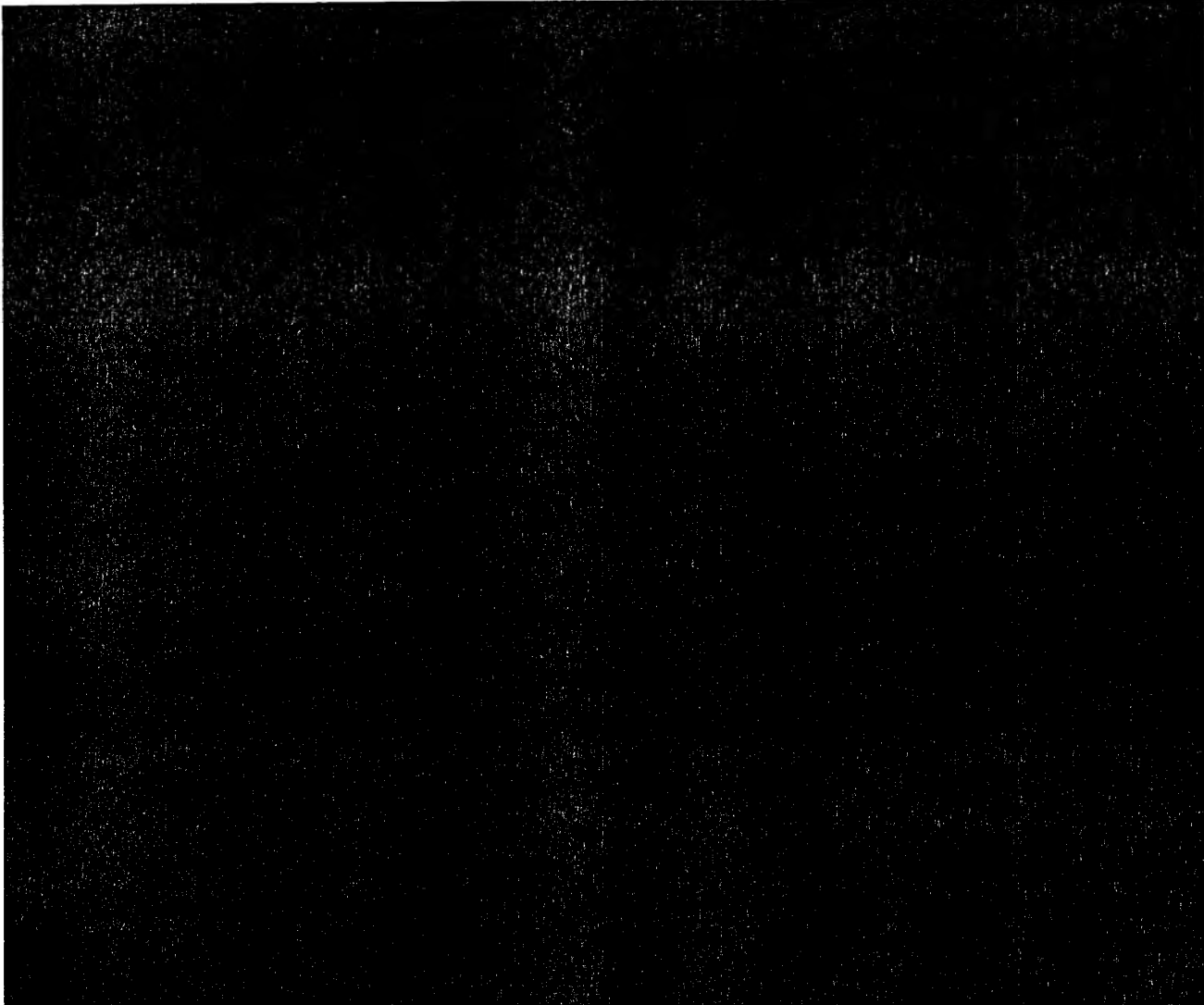
Comprehensive Report



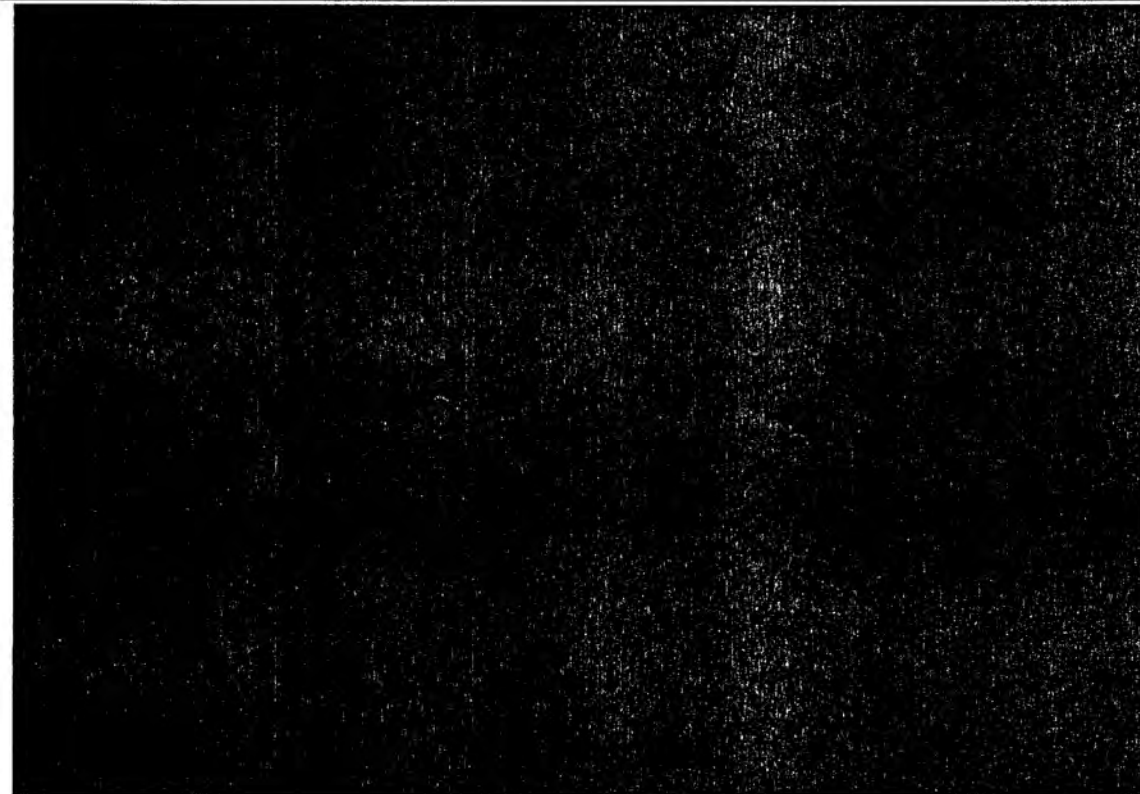
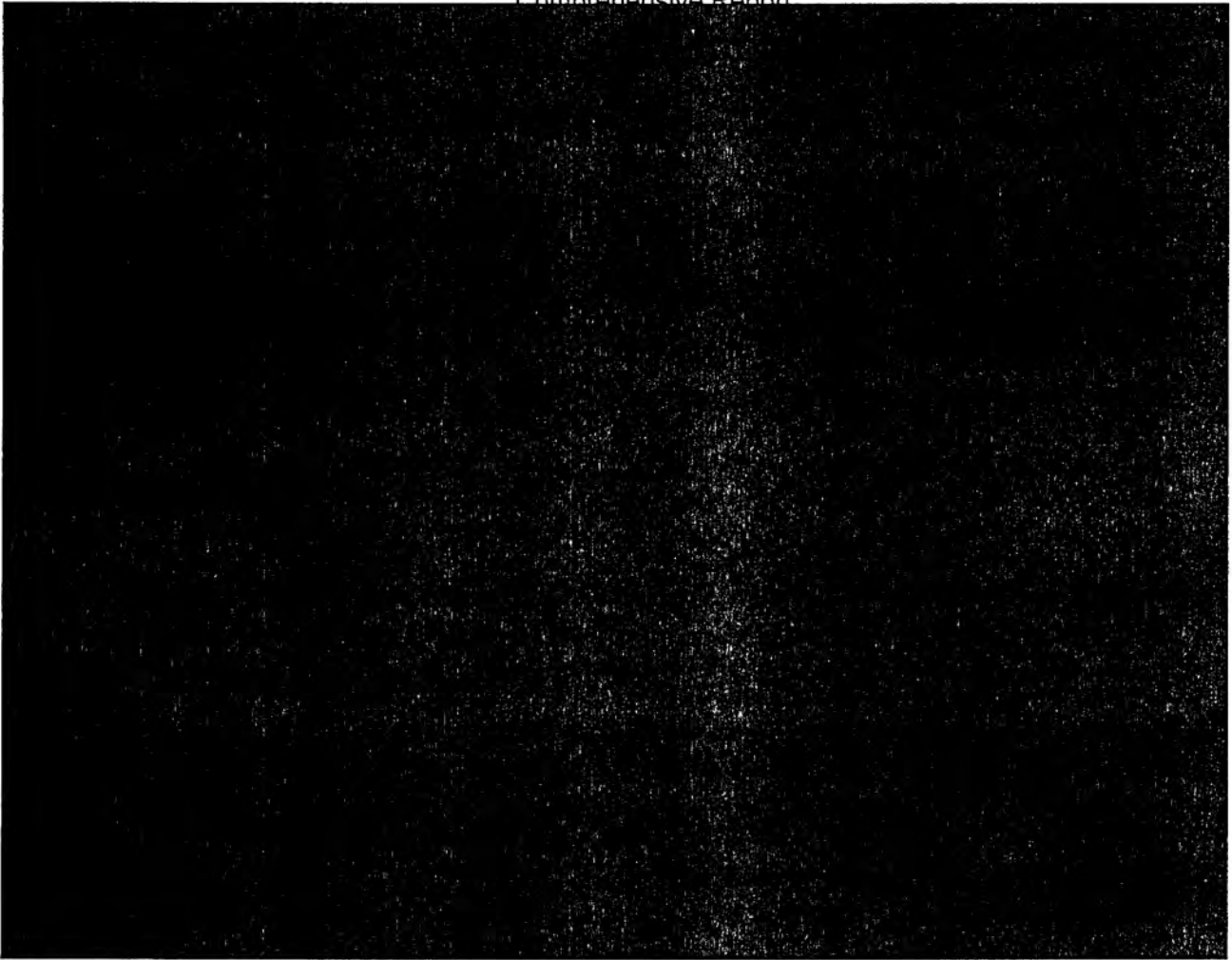
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Comprehensive Report



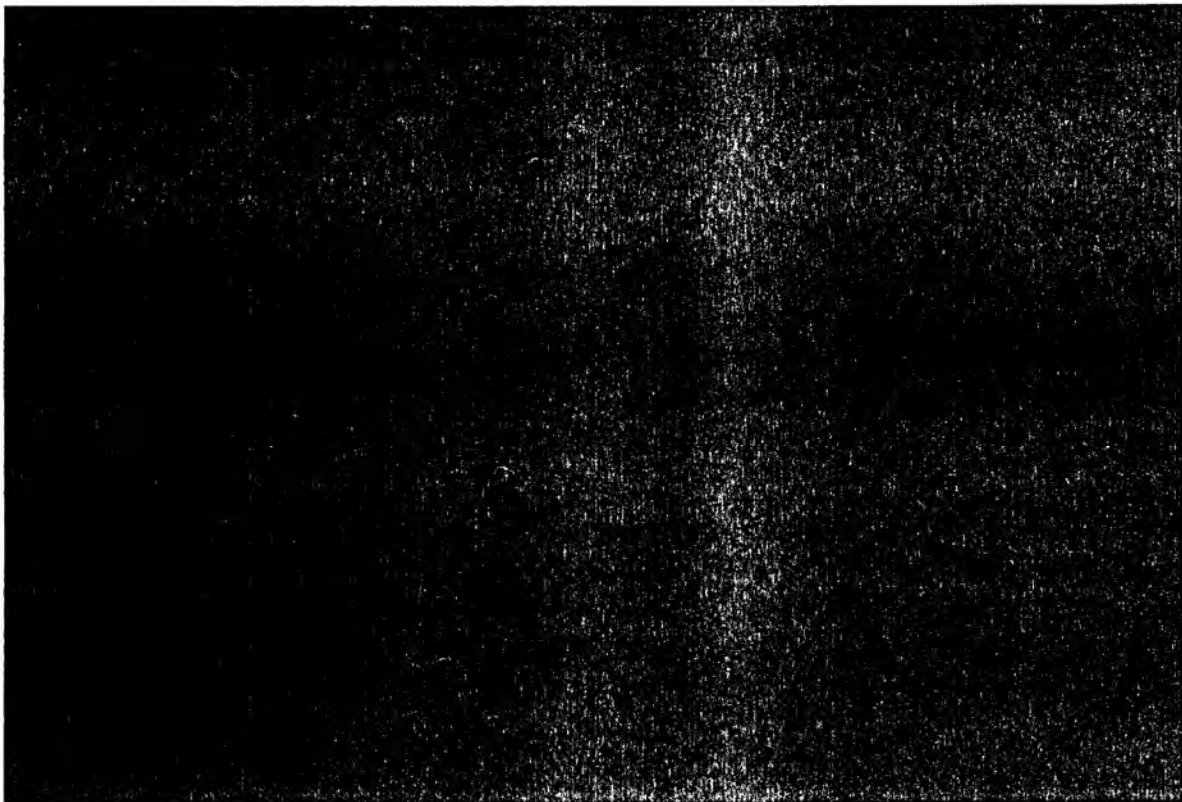
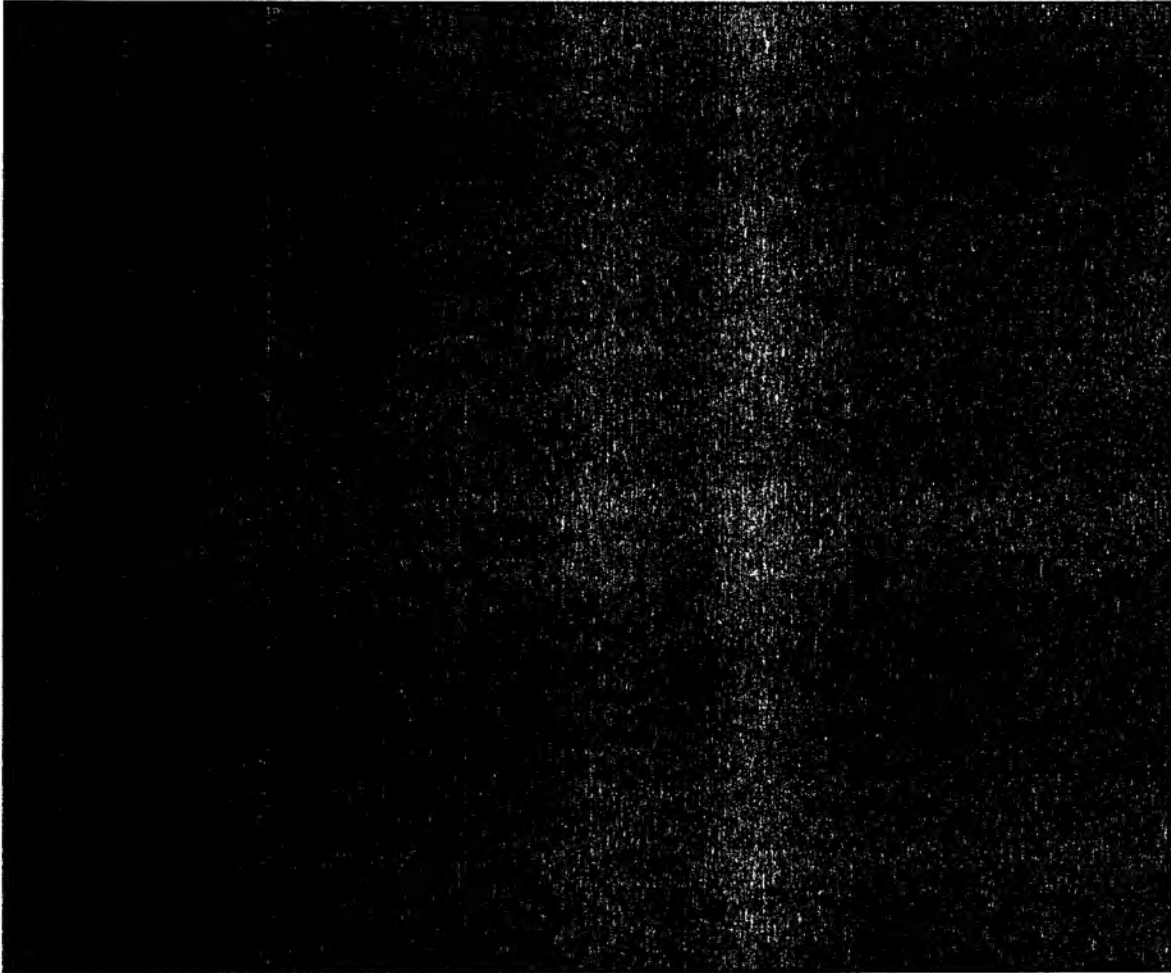
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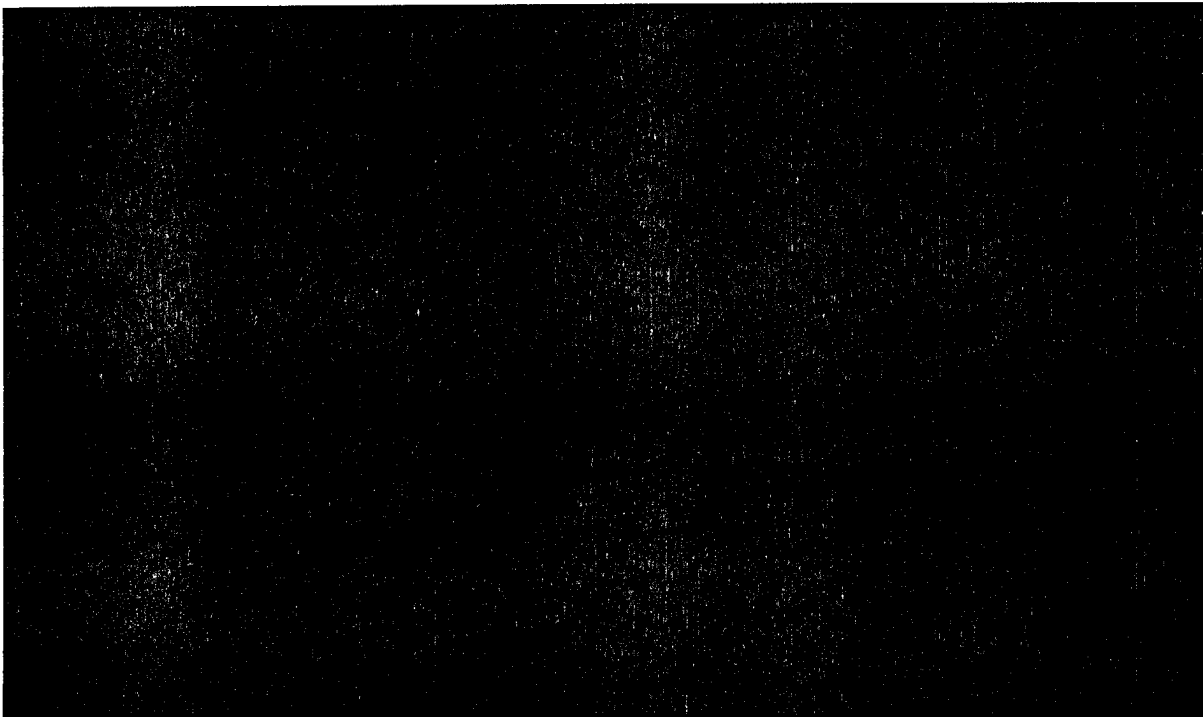
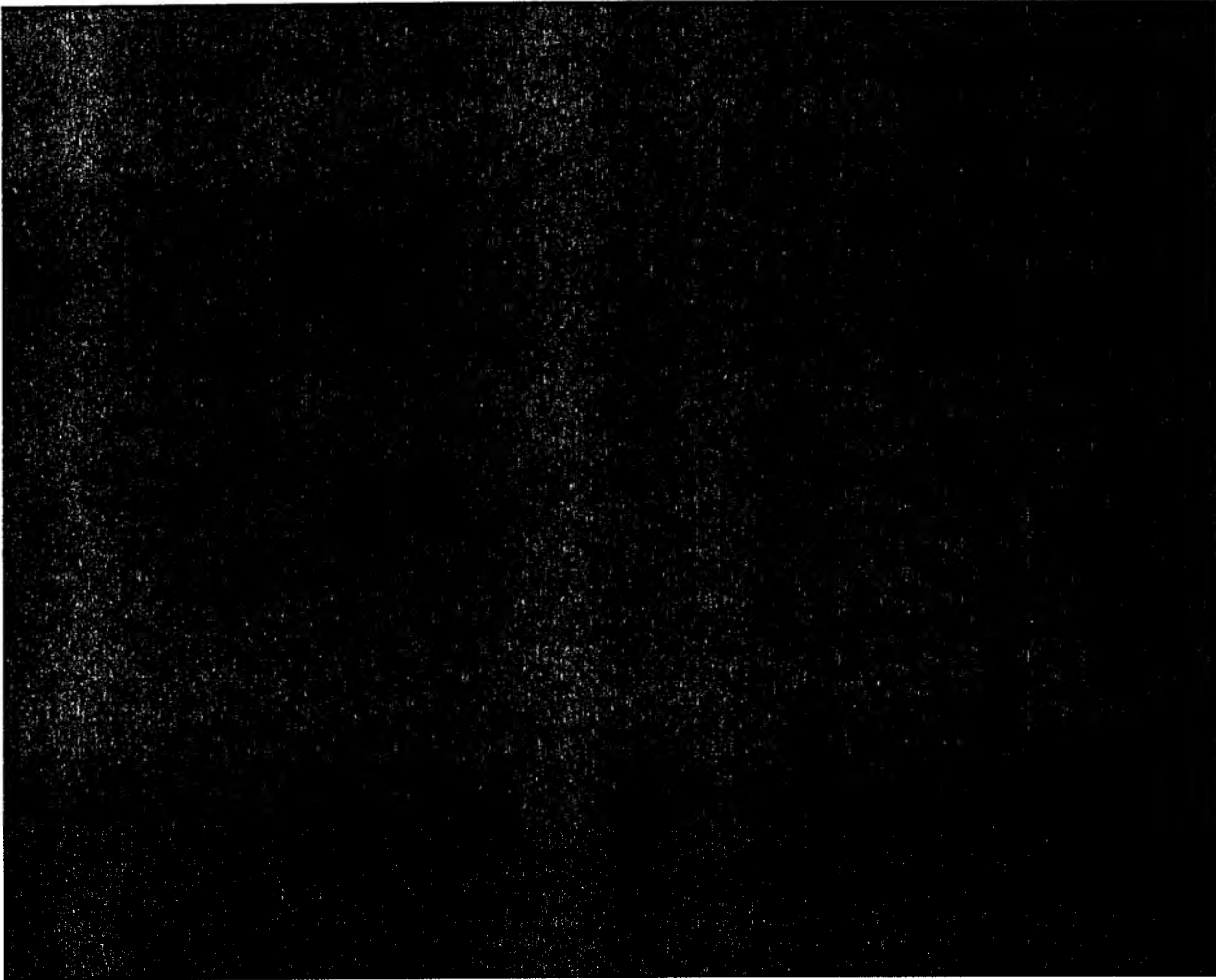
Comprehensive Report



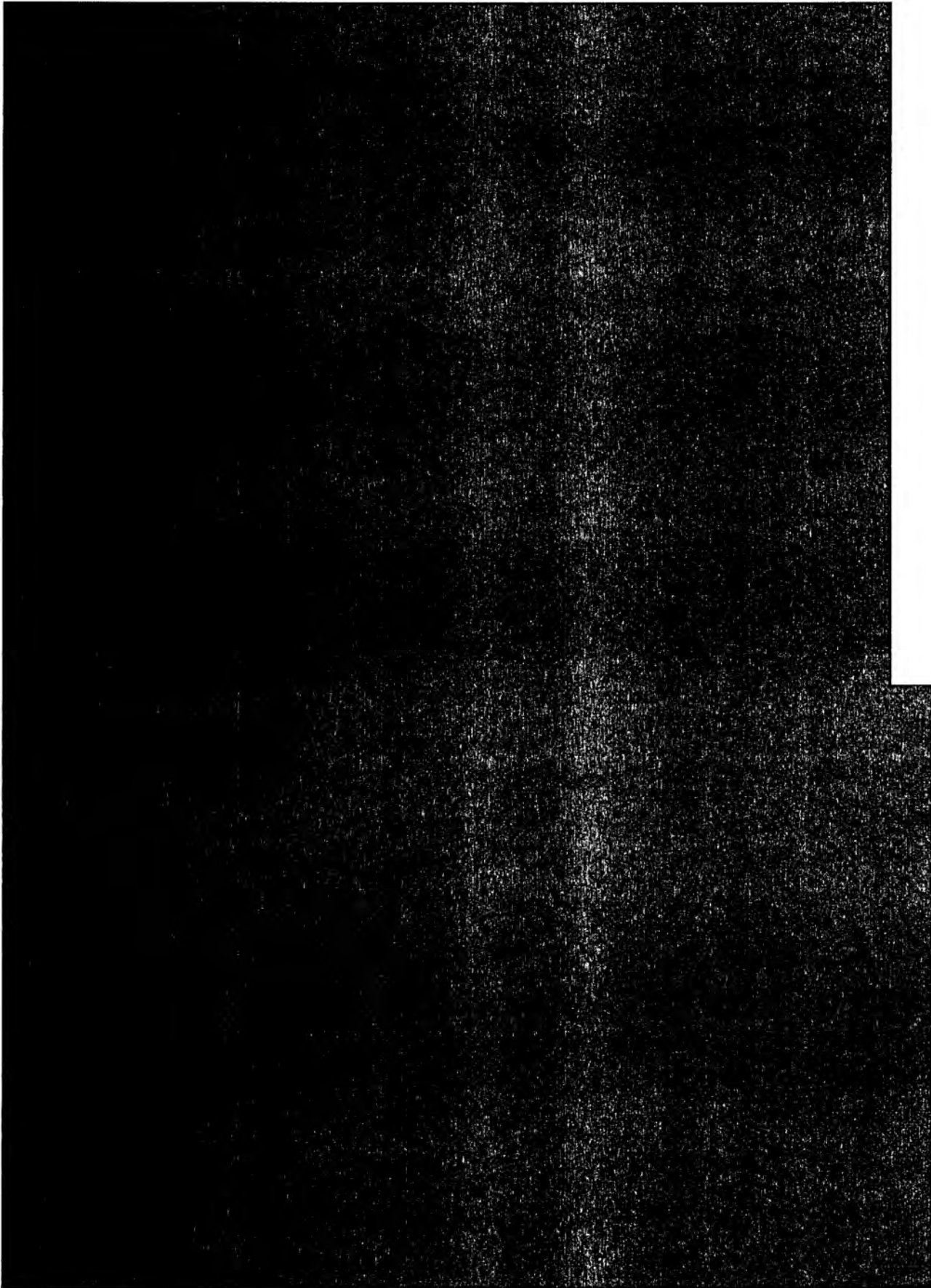
Comprehensive Report



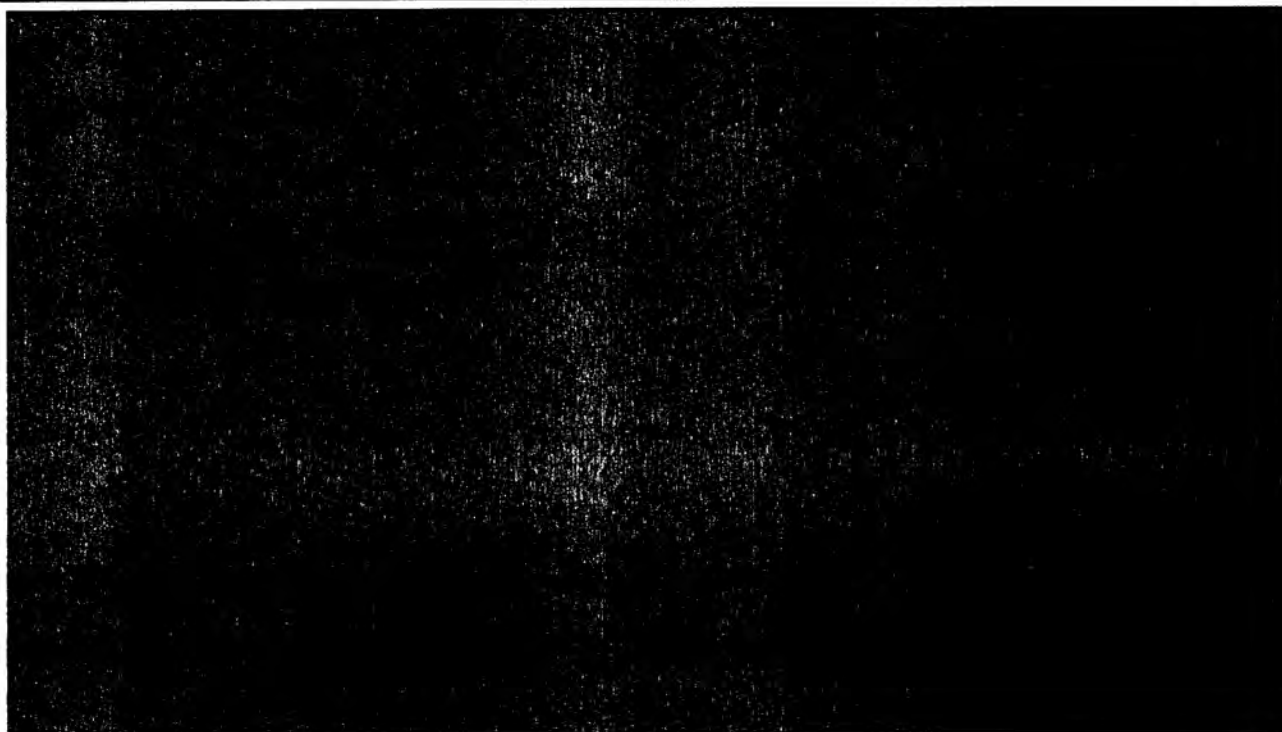
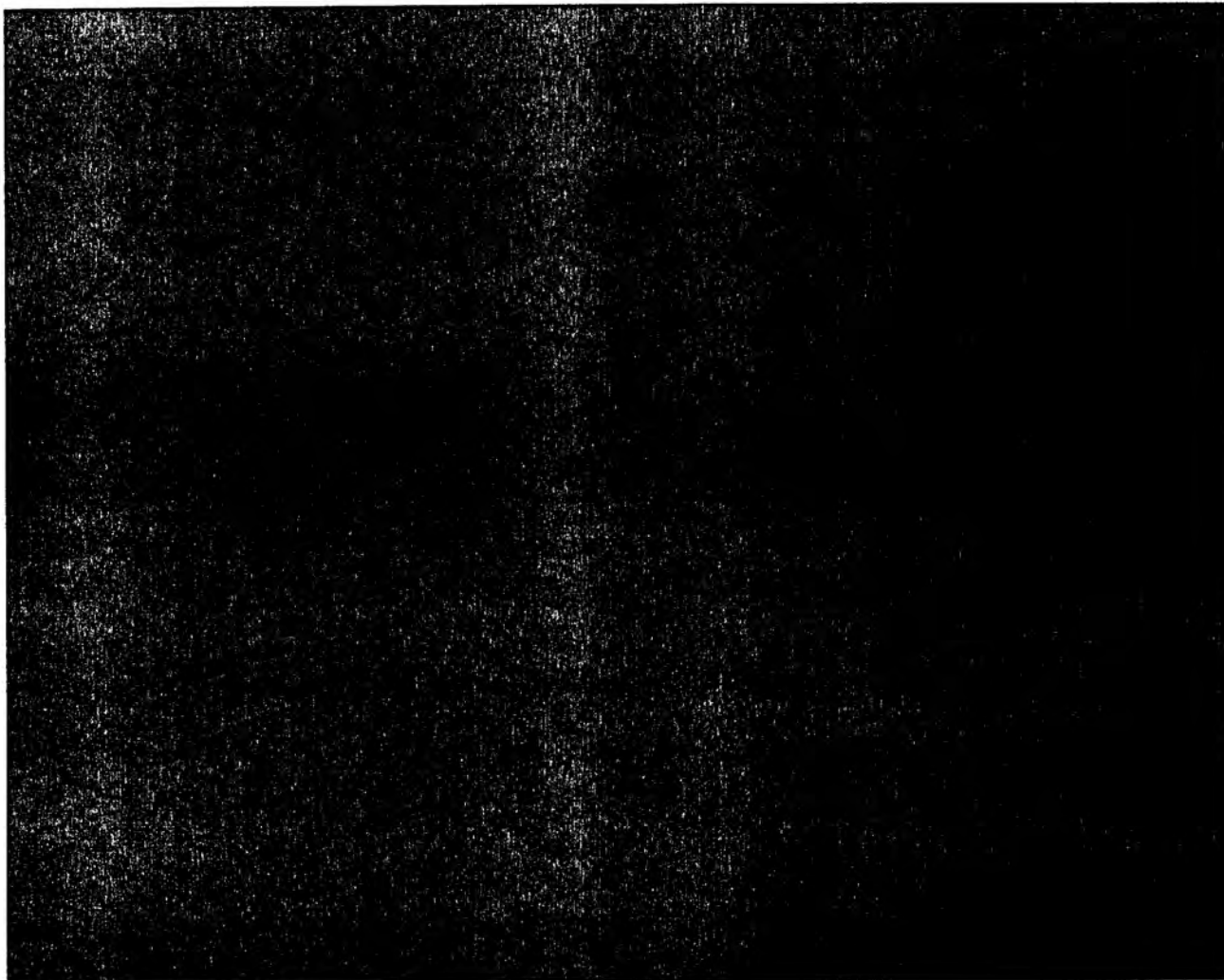
Comprehensive Report



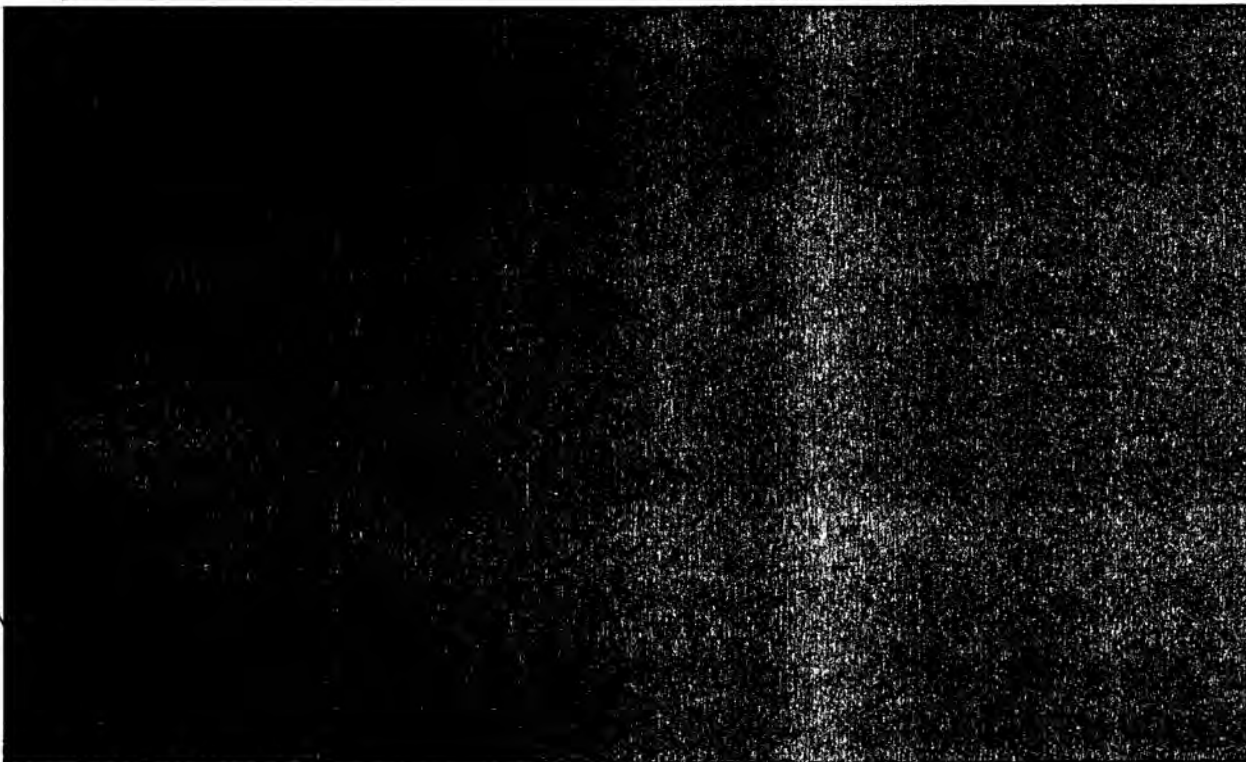
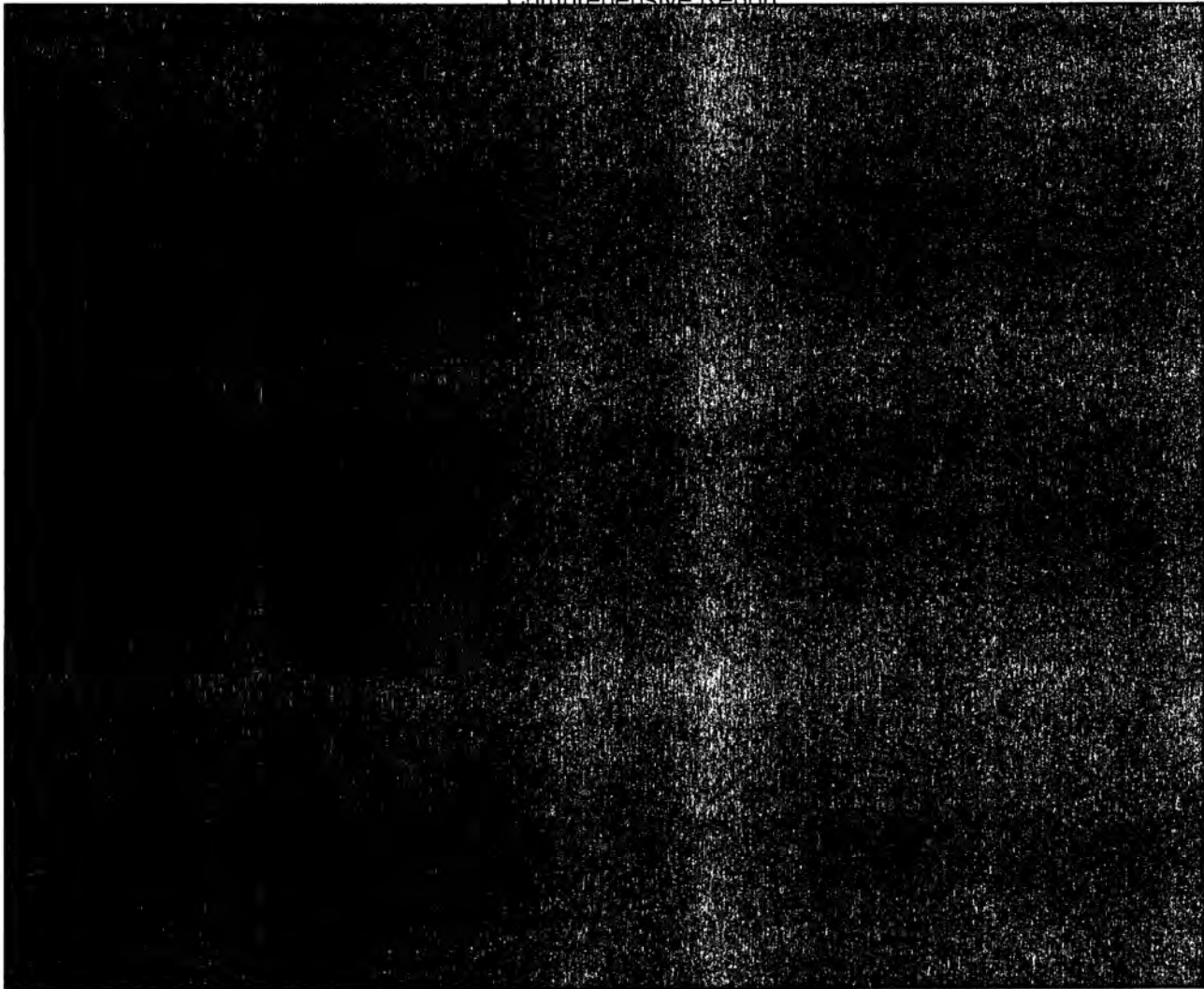
Comprehensive Report



Comprehensive Report



Comprehensive Report



Comprehensive Report

Comprehensive Report

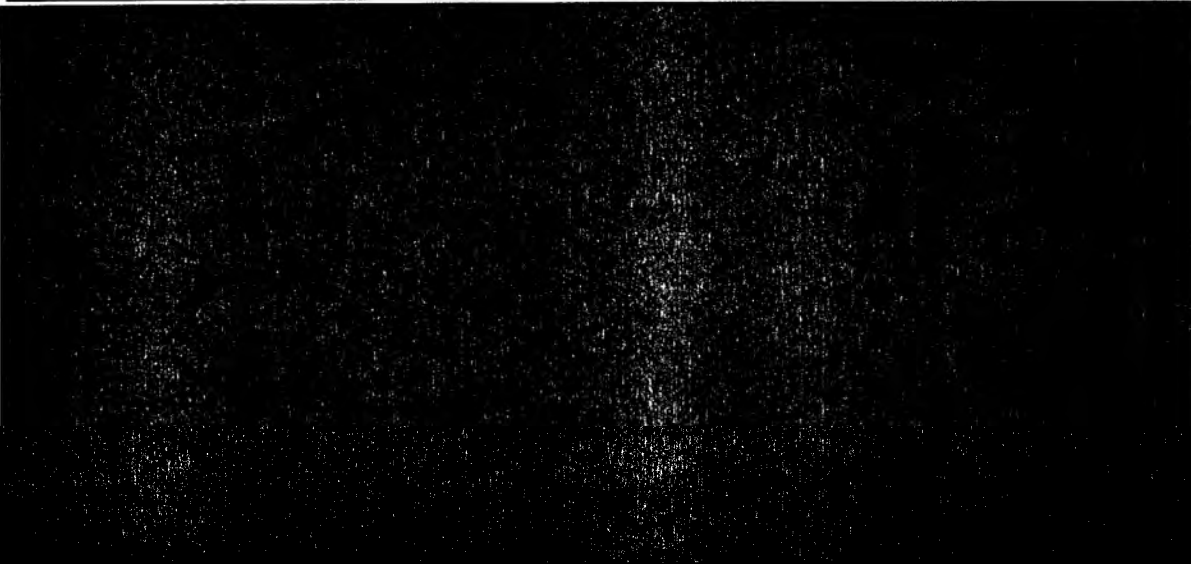
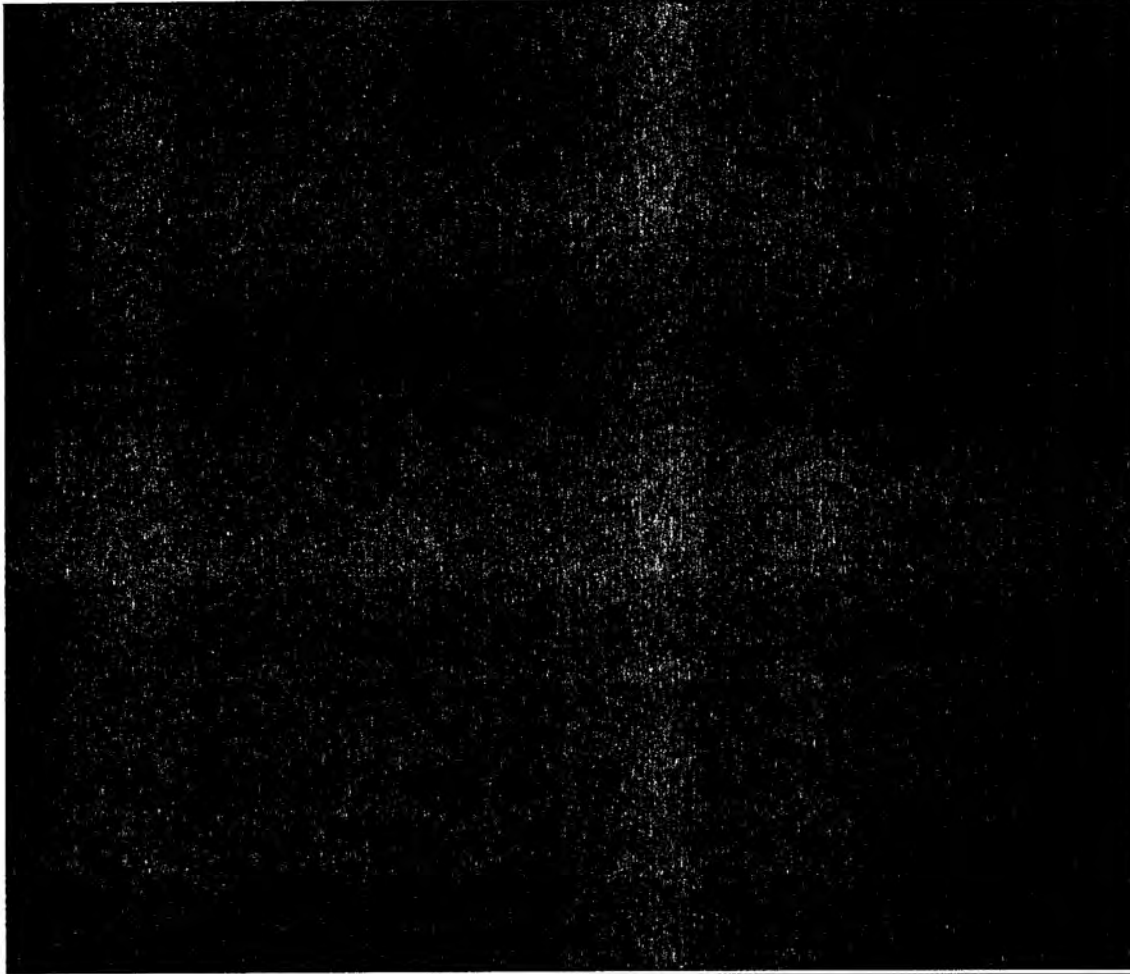


Exhibit K

Comprehensive Report



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Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings

Your GLBA Permissible Use: Use by Persons Holding a Legal or Beneficial Interest Relating to the Consumer

Your DMF Permissible Use: No Permissible Purpose

Comprehensive Report

Date: 04/11/19

Reference Code: Todd, Peter

Report Legend:



- Shared Address

- Deceased

- Probable Current Address

Report processed by:

KRONENBERGER ROSENFELD, LLP
150 POST ST STE 520
SAN FRANCISCO, CA 94108
415-955-1155 Main Phone
415-955-1158 Fax

Subject Information

(Best Information for Subject)

Name: HENRY DEVALENCE

Date of Birth: REDACT

Age: R

SSN: REDACTE - SSN potentially randomly issued by the SSA.

AKAs

(Names Associated with Subject)

HENRY R DEVALENCE

Age: R SSN: REDACT

SSN potentially randomly issued by the SSA.

HENRY DE VALENCE

SSN: REDACTE

SSN potentially randomly issued by the SSA.

HENRY DE VALENCE

SSN: REDACTR

SSN potentially randomly issued by the SSA.

Indicators

Bankruptcy: No

Property: No

Corporate Affiliations: No

Comprehensive Report Summary:

Bankruptcies:

None Found

Liens and Judgments:

None Found

UCC Filings:

None Found

Phones Plus:

None Found

People at Work:

None Found

Driver's License:

None Found

Address(es) Found:

0 Verified and 1 Non-Verified Found

Possible Properties Owned:

Comprehensive Report

None Found
Motor Vehicles Registered:
None Found
Watercraft:
None Found
FAA Certifications:
None Found
FAA Aircrafts:
None Found
Possible Criminal Records:
None Found
Sexual Offenses:
None Found
Professional Licenses:
None Found
Voter Registration:
None Found
Hunting/Fishing Permit:
None Found
Concealed Weapons Permit:
None Found
Possible Associates:
None Found
DEA Controlled Substances:
None Found
Possible Relatives:
1st Degree - None Found
2nd Degree - None Found
3rd Degree - None Found
Neighbors:
1st Neighborhood - 3 Found

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

[None Found]

Address Summary:

REDACTED

Active Address(es):

[None Found]

Previous And Non-Verified Address(es):

REDACTED

Comprehensive Report

REDACTED

Bankruptcies:

[None Found]

Liens and Judgments:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

[None Found]

People at Work:

Maximum 50 People at Work records returned

[None Found]

Driver's License Information:

[None Found]

Possible Properties Owned by Subject:

[None Found]

Motor Vehicles Registered To Subject:

[None Found]

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

[None Found]

Hunting/Fishing Permit:

[None Found]

Concealed Weapons Permit:

[None Found]

Comprehensive Report

Firearms and Explosives:

[None Found]

DEA Controlled Substances:

[None Found]

Possible Associates:

[None Found]

Possible Relatives:

[None Found]

Neighbors:

Neighborhood:

REDACTED

[REDACTED]

Exhibit L

<i>Attorney or Party without Attorney:</i> KARL S. KRONENBERGER, Bar #226112 KRONENBERGER ROSENFELD, LLP 150 POST STREET, SUITE 520 SAN FRANCISCO, CA 94108 Telephone No: 415-955-1155 FAX: No: 415-955-1158				<i>For Court Use Only</i>	
<i>Attorney for:</i> Plaintiff		<i>Ref. No or File No.:</i>			
<i>Insert name of Court, and Judicial District and Branch Court:</i> United States District Court, Northern District Of California					
<i>Plaintiff:</i> PETER TODD <i>Defendant:</i> SARAH MICHELLE REICHWEIN, et al					
AFFIDAVIT OF REASONABLE DILIGENCE		<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i> 3:19-cv-01751

1. I, KRIS VORSATZ, and any employee or independent contractors retained by MICHELSON ATTORNEY SERVICE are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on Defendant SARAH MICHELLE REICHWEIN aka ISIS AGORA LOVECRUFT as follows:

2. *Documents:* SUMMONS & COMPLAINT; ,.

Day	Date	Time	Location	Results
Fri	04/05/19	12:30pm	Home	BEGAN STAKEOUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Fri	04/05/19	10:15pm	Home	ENDED STAKEOUT, NO ONE CAME OUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Sat	04/06/19	6:00am	Home	BEGAN STAKEOUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Sat	04/06/19	4:00pm	Home	ENDED STAKEOUT, NO ONE CAME OUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Sun	04/07/19	11:00am	Home	BEGAN STAKEOUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Sun	04/07/19	12:00pm	Home	BEGAN STAKOUT Attempt made by: KRIS VORSATZ. Attempt at: 609 PRECITA AVE. SAN FRANCISCO, CA 94110.
Mon	04/08/19	12:00pm	Home	RETURNED NOT SERVED on: SARAH MICHELLE REICHWEIN aka ISIS AGORA LOVECRUFT Home - 609 PRECITA AVE. SAN FRANCISCO, CA 94110. Served by: KRIS VORSATZ

<i>Attorney or Party without Attorney:</i> KARL S. KRONENBERGER, Bar #226112 KRONENBERGER ROSENFELD, LLP 150 POST STREET, SUITE 520 SAN FRANCISCO, CA 94108 Telephone No: 415-955-1155 FAX: No: 415-955-1158				<i>For Court Use Only</i>	
<i>Attorney for:</i> Plaintiff					
<i>Insert name of Court, and Judicial District and Branch Court:</i> United States District Court, Northern District Of California					
<i>Plaintiff:</i> PETER TODD <i>Defendant:</i> SARAH MICHELLE REICHWEIN, et al					
AFFIDAVIT OF REASONABLE DILIGENCE		<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i> 3:19-cv-01751

Day	Date	Time	Location	Results
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3. *Person Executing*

a. KRIS VORSATZ

b. MICHELSON ATTORNEY SERVICE

5776 LINDERO CANYON ROAD

SUITE D-219

WESTLAKE VILLAGE, CA 91362

c. 888-780-0886, FAX 818-337-7150

Recoverable Costs Per CCP 1033.5(a)(4)(B)

d. *The Fee for service was:*

e. *I am:* (3) registered California process server

(i) Owner

(ii) *Registration No.:* 1160

(iii) *County:* Santa Clara

4. *I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.*

Date: Fri, May. 03, 2019

Page Number 2

(KRAIG VORSATZ, C.C.P.S.)

AFFIDAVIT OF REASONABLE DILIGENCE

2797.69118

Exhibit M

Jeff Rosenfeld

From: Jeff Rosenfeld
Sent: Tuesday, April 16, 2019 1:38 PM
To: isis@patternsinthevoid.net
Subject: Todd v. Reichwein, Case No. 3:19-cv-01751: Service of Process
Attachments: Summons and Complaint Packet (FINAL 4.3.19).pdf; Plaintiff's Ntc of Lawsuit and Request to Waive Service of Summons (SENT 4.16.19).pdf

Dear Isis Agora Lovecruft,

Please forward this correspondence to your attorney if you are represented by counsel.

Please take notice that you have been named as a defendant in the lawsuit entitled *Peter Todd v. Sarah Michelle Reichwein aka Isis Agora Lovecruft*, Case No. 3:19-cv-01751, pending in the United States District Court for the Northern District of California. Attached please find the case-initiating documents, including the summons and complaint.

Also, attached please find: a) Notice of Lawsuit and Request to Waive Service; and b) Waiver of Service of Summons. If you agree to waive formal service of process for this action, please complete the Waiver of Service of Summons and return it to me by email or postal mail.

Sincerely,
Jeff Rosenfeld

Jeffrey M. Rosenfeld

PARTNER

KRONENBERGER ROSENFELD, LLP

150 Post Street, Ste 520 San Francisco, CA 94108

Phone: (415) 955-1155 Ext. 112

[Get vCard](#) [LinkedIn](#) jeff@krinternetlaw.com
www.krinternetlaw.com



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NOTICE: This email may contain material that is privileged, confidential, and/or attorney-client work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express written permission is strictly prohibited. If you are not the intended recipient, please contact the sender at the above number and delete all copies. Inadvertent waiver shall waive no privileges.

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein (the foregoing paragraph has been affixed pursuant to U.S. Treasury Regulations governing tax practice).

AO 398 (Rev. 01/09) Notice of a Lawsuit and Request to Waive Service of a Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual,

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF A SUMMONS

To: Sarah Michelle Reichwein, aka Isis Agora Lovecruft

(Name of the defendant or - if the defendant is a corporation, partnership, or association - an officer or agent authorized to receive service)

Why are you getting this?

A lawsuit has been filed against you, or the entity you represent, in this court under the number shown above. A copy of the complaint is attached.

This is not a summons, or an official notice from the court. It is a request that, to avoid expenses, you waive formal service of a summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within 30 days (give at least 30 days, or at least 60 days if the defendant is outside any judicial district of the United States) from the date shown below, which is the date this notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

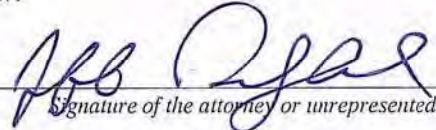
If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint (or 90 days if this notice is sent to you outside any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will arrange to have the summons and complaint served on you. And I will ask the court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: 04/16/2019



Signature of the attorney or unrepresented party

Jeffrey M. Rosenfeld

Printed name

150 Post St., Suite 520
San Francisco, CA 94108

Address

jeff@KRInternetLaw.com

E-mail address

415-955-1155

Telephone number

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (Bar No. 226112)

Jeffrey M. Rosenfeld (Bar No. 222187)

Liana W. Chen (Bar No. 296965)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

jeff@KRInternetLaw.com

liana@KRInternetLaw.com

Attorneys for Plaintiff Peter Todd

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PETER TODD, an individual,

Plaintiff,

v.

**SARAH MICHELLE REICHWEIN aka ISIS
AGORA LOVECRUFT**, an individual,

Defendant.

Case No. 3:19-cv-01751

**COMPLAINT FOR INJUNCTIVE
RELIEF AND DAMAGES****DEMAND FOR JURY TRIAL**

1 Plaintiff Peter Todd, an individual, by and through his attorneys of record, states
2 and alleges as follows:

3 INTRODUCTION

4 1. Plaintiff Peter Todd ("Plaintiff" or "Todd") is a former Bitcoin Core developer
5 and an applied cryptography consultant. Todd regularly speaks at conferences
6 throughout the world regarding his work in cryptography.

7 2. Defendant Sarah Michelle Reichwein ("Defendant"), who goes by the
8 fictitious name Isis Agora Lovecruft, is a self-described "anarchist; hacker; once-upon-a-
9 time theoretical physicist." Like Todd, Defendant regularly attends cryptography
10 conferences.

11 3. Todd and Defendant are acquaintances, having interacted on multiple
12 occasions at cryptography conferences and social events.

13 4. In or around June 2016, Defendant publicly accused third party Jacob
14 Appelbaum of sexually assaulting her.

15 5. When Todd did not publicly condemn Appelbaum, Defendant published
16 false statements about Todd on her Twitter profile accusing Todd of rape and sexual
17 assault.

18 6. Defendant's statements are false as Todd has never raped or sexually
19 assaulted anyone.

20 7. Defendant's statements accusing Todd of rape and sexual assault remain
21 publicly viewable on Defendant's Twitter profile.

22 8. Todd has been harmed and continues to be harmed by Defendant's
23 defamatory statements.

24 JURISDICTION AND VENUE

25 9. This Court has subject matter jurisdiction over this action pursuant to 28
26 U.S.C. §1332. Plaintiff Peter Todd is a citizen of a foreign state, namely Canada, and has
27 not been admitted for permanent residence in the United States. On information and
28 belief, Defendant is a citizen of California in that she is a citizen of the U.S. and a

1 domiciliary of California. The matter in controversy exceeds the sum or value of \$75,000,
2 exclusive of interest and costs.

3 10. Venue is proper pursuant to 28 U.S.C. §1391 because, on information and
4 belief, Defendant resides in this district.

5 11. This Court has personal jurisdiction over Defendant, because, on
6 information and belief, Defendant resides in California and has substantial, continuous,
7 and systematic contacts with California.

8 INTRADISTRICT ASSIGNMENT

9 12. Because a substantial part of the events which give rise to Plaintiff's claim
10 occurred in Alameda County, pursuant to Local Civil Rule 3-2, this action should be
11 assigned to the San Francisco or Oakland Division.

12 PARTIES

13 13. Plaintiff Peter Todd is an individual and a citizen of Canada, residing in
14 Ontario, Canada.

15 14. On information and belief, Defendant Sarah Michelle Reichwein, who goes
16 by the fictitious name Isis Agora Lovecraft, is an individual, a U.S. citizen, and a
17 domiciliary of California.

18 FACTUAL ALLEGATIONS

19 15. Todd is a Bitcoin enthusiast and expert, consultant, and a leading developer
20 of cryptocurrency and blockchain software.

21 16. Todd is highly-regarded in the cryptography and cryptocurrency sectors for
22 his expertise in the security properties of the Bitcoin network and other decentralized
23 technologies.

24 17. Given his standing in the cryptography and cryptocurrency sectors, Todd is
25 regularly invited to speak at cryptography conferences throughout the world.

26 18. Additionally, Todd provides professional consulting services in
27 cryptography and cryptocurrency, for which he receives a premium in compensation
28 based on his knowledge and experience.



1 19. Todd has developed a large online following, and he regularly posts to his
2 Twitter profile under the handle @peterktodd, where he has numerous followers in the
3 cryptography and cryptocurrency sectors.

4 20. Todd's reputation, including his online reputation, are important aspects of
5 his standing in the cryptography community and his ability to maintain his consulting
6 profession.

7 21. Defendant is a self-described "anarchist; hacker; once-upon-a-time
8 theoretical physicist."

9 22. Defendant previously worked for The Tor Project, Inc., the goal of which is
10 to provide a way of using the Internet with as much privacy as possible, including by
11 routing Internet traffic through multiple servers and encrypting it each step of the way.

12 23. Like Todd, Defendant regularly attends cryptography conferences.

13 24. Todd initially met Defendant at the Summer 2014 Tor Dev Meeting, a
14 conference regarding the anonymizing software Tor.

15 25. Defendant disclosed her name to Todd as "Isis Agora Lovecraft." Todd
16 recognized the name as a pseudonym, as the use of pseudonyms is a common practice
17 in the cryptography community. Todd only discovered Defendant's actual name right
18 before filing this Complaint, after he engaged a private investigator to find that information
19 for purposes of bringing this lawsuit.

20 26. Between 2014 and 2016, Todd and Defendant had intermittent in-person
21 contact when they attended cryptography conferences.

22 27. Additionally, between 2014 and 2016, Todd and Defendant spent time
23 together socially on a few occasions.

24 28. Todd and Defendant also engaged in semi-regular online communications,
25 including via Twitter and Pond, an encrypted messaging application.

26 29. On or around June 15, 2016, Defendant publicly published on her Twitter
27 profile that third party Jacob Appelbaum had sexually assaulted her. Appelbaum is a
28 cryptography expert and was a core member of the Tor Project.



1 30. Initially, Todd published statements to Defendant commending her on her
2 bravery and denouncing sexual violence. Defendant reflected her approval of Todd's
3 statements, liking one of Todd's Twitter comments.

4 31. In August 2016, Todd publicly stated that he did not know what was true
5 regarding Defendant's and others' allegations against Appelbaum.

6 32. Around that same time, Defendant blocked Todd from viewing her Twitter
7 profile.

8 33. In May 2017, Todd communicated with Defendant through Github, a
9 professional platform designed for public software development. More specifically, Todd
10 requested more information from Defendant regarding a software programming issue,
11 namely, "how the callee is supposed to ensure that the bytes represent a valid
12 CompressedEdwardsY."

13 34. In response to Todd's request, Defendant published the following
14 statement:

15 "First things first: @petertodd, you've publicly, repetitively defended a man
16 who raped me and several other people, and disparaged the victims who
17 were brave enough to come forward with their stories. **Do not speak to**
18 **me. Do not use work as an excuse to speak to me. Do not use**
19 **cryptography as an excuse to speak to me.**"

20 (emphasis in original).

21 35. Thereafter, Todd did not initiate any contact with Defendant, either in person
22 or electronically.

23 36. On February 5, 2019, Defendant published the following statement on her
24 Twitter profile at <<https://twitter.com/isislovecruft/status/1093033203219148800>>:

25 "This is not even touching upon the stories of the rape and assault survivors
26 of you and @petertodd and @ioerror and you all have been seen to behave
27 conveniently alike and seen to dutifully protect one another 🙄."

28 37. On February 8, 2019, Defendant published the following statement on her

1 Twitter profile at <<https://twitter.com/isislovecruft/status/1094091846047985666>> as a
2 follow up to her February 5, 2019 statement:

3 "i love watching the men in my industry who've sexually abused me and
4 many others squirm as I take them out one by one while they nervously
5 await their turn [¶] hahahahahahaha eat goat dung you epoxy brained
6 cowards."

7 38. On February 20, 2019, Defendant published the following statement on her
8 Twitter profile at <<https://twitter.com/isislovecruft/status/1098270385148022784>>:

9 "Nadim Kobeissi is a serial rapist and abuser who defends other rapists
10 including Jacob Appelbaum and Peter Todd and in 2012 he grabbed my
11 face and force kissed me at a conference and i absolutely believe the
12 multiple survivors i've personally spoken with since then."

13 39. On February 20, 2019, Defendant published the following statement on her
14 Twitter profile at <<https://twitter.com/isislovecruft/status/1098280935353606144>>:

15 "yes, similar to Nadim, i personally have a story about Peter Todd and i've
16 personally spoken with survivors with absolutely awful and horrifying reports
17 who are terrified of him and of coming forward (rightly so) [¶] i however am
18 not afraid and shitty dudes are going down"

19 (the "Statement(s)").

20 40. The Statements contain and comprise false assertions of fact.

21 41. Contrary to the Statements, Todd has not raped Defendant or anybody else.

22 42. Contrary to the Statements, Todd has not sexually assaulted or otherwise
23 assaulted Defendant or anybody else.

24 43. Defendant's Twitter profile has over 20,000 followers.

25 44. Numerous people have viewed Defendant's Statements, and numerous
26 people have publicly commented on Defendant's Statements.

27 45. Defendant knew that her Statements were false when she made them
28 because Defendant knew that Todd had never raped her or sexually abused her.



1 Alternatively or additionally, Defendant acted in reckless disregard of the falsity of her
 2 Statements when she published them because the Statements falsely represent that
 3 Todd engaged in the most serious of misconduct, because Defendant had no credible
 4 evidence supporting her Statements when she published them, and because Defendant's
 5 social history with Todd contradicted the Statements.

6 46. As of the filing of this Complaint, the Statements remain publicly viewable
 7 on Defendant's Twitter profile.

8 47. Todd has been harmed by Defendant's Statements, including shame,
 9 embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
 10 reputation among his friends, peers, and professional community.

11 48. Additionally, and on information and belief, Todd has lost business and
 12 professional opportunities, including conference speakerships, because of Defendant's
 13 Statements.

14 **FIRST CAUSE OF ACTION**
 15 **(Defamation Under California Law)**

16 49. Todd repeats and incorporates by reference the allegations in Paragraphs
 17 1–48 above.

18 50. Todd is a private figure in that he has not voluntarily injected himself into a
 19 public controversy, and he has not achieved fame that reaches widely and pervasively
 20 throughout society.

21 51. Defendant published the defamatory Statements about Todd in at least the
 22 four Twitter posts identified herein and dated February 5, 2019, February 8, 2019, and
 23 February 20, 2019 (2).

24 52. Numerous people have viewed the Statements on Defendant's Twitter
 25 profile.

26 53. The Statements contain false assertions of fact, including that Todd raped
 27 and/or sexually assaulted Defendant and/or other people.

28 54. The Statements are false in that Todd has never raped or sexually



1 assaulted Defendant or any other person.

2 55. Defendant acted with malice when she published the defamatory
3 Statements. To wit, Defendant knew that her defamatory Statements were false when
4 she made them because Defendant knew the true state of affairs relating to Todd. In the
5 alternative, Defendant acted recklessly regarding the falsity of her Statements where the
6 Statements alleged that Todd engaged in the most serious of misconduct, where
7 Defendant had no credible evidence supporting her Statements, and where Defendant's
8 social history with Todd contradicted the Statements.

9 56. Defendant acted without any privilege when she published the defamatory
10 Statements.

11 57. The defamatory Statements constitute defamation per se because the
12 Statements: a) falsely charge Todd with committing illegal acts (i.e., rape; sexual assault),
13 b) contain charges by implication from the language employed such that the reader would
14 understand the defamatory meaning without the necessity of knowing extrinsic
15 explanatory matter, and c) by natural consequence would cause Todd actual damages.

16 58. On information and belief, Defendant published the defamatory
17 Statements willfully and maliciously with the intent to harm Todd.

18 59. As a result of Defendant's defamatory Statements, Todd has suffered
19 shame, embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
20 reputation among his friends, peers, and in his professional community.

21 60. Additionally, on information and belief, Todd has lost professional
22 opportunities, including conference speakerships, because of Defendant's Statements.

23 61. Defendant's defamatory Statements remain viewable on her public Twitter
24 profile as of the filing of this Complaint and continue to cause harm to Todd that cannot
25 be addressed by monetary damages alone.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff Peter Todd respectfully requests that the Court enter
28 judgment in favor of Plaintiff and against Defendant and award the following relief to



1 Plaintiff and against Defendant:

2 1. A permanent injunction requiring Defendant to remove defamatory
3 publications she has made about Plaintiff;

4 2. An award of damages to Plaintiff and against Defendant in an amount to be
5 proved at trial, comprising the following:

6 a. Compensatory damages under California law, including California
7 Civil Code section 3281;

8 b. Punitive damages pursuant to California Civil Code section 3294;

9 c. Plaintiff's costs of suit;

10 d. Pre-judgment interest to the extent allowed by law; and

11 3. Such other and additional relief as the Court deems just and proper.

12
13 Respectfully Submitted,

14 DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

15
16 By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

17
18 Attorneys for Plaintiff Peter Todd

KRONENBERGER ROSENFELD
150 Post Street, Suite 520, San Francisco, CA 94108



DEMAND FOR JURY TRIAL

Plaintiff, by and through his undersigned counsel, hereby demands a trial by jury for all questions of fact that can be decided by a jury in the above-entitled action.

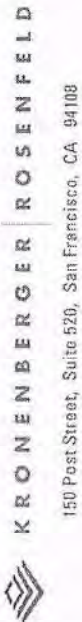
Respectfully Submitted,

DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

Attorneys for Plaintiff Peter Todd



AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual, .

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

WAIVER OF THE SERVICE OF SUMMONS

To: Jeffrey M. Rosenfeld

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 04/16/2019, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: _____

Signature of the attorney or unrepresented party_____
Printed name of party waiving service of summons_____
Printed name_____
Address_____
E-mail address_____
Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual,

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

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(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 04/16/2019, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date:

*Signature of the attorney or unrepresented party**Printed name of party waiving service of summons**Printed name**Address**E-mail address**Telephone number*

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Signature of Clerk or Deputy Clerk

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (Bar No. 226112)

Jeffrey M. Rosenfeld (Bar No. 222187)

Liana W. Chen (Bar No. 296965)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

jeff@KRInternetLaw.com

liana@KRInternetLaw.com

Attorneys for Plaintiff Peter Todd

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PETER TODD, an individual,

Plaintiff,

v.

**SARAH MICHELLE REICHWEIN aka ISIS
AGORA LOVECRUFT**, an individual,

Defendant.

Case No. 3:19-cv-01751

**COMPLAINT FOR INJUNCTIVE
RELIEF AND DAMAGES**

DEMAND FOR JURY TRIAL



1 Plaintiff Peter Todd, an individual, by and through his attorneys of record, states
2 and alleges as follows:

3 INTRODUCTION

4 1. Plaintiff Peter Todd ("Plaintiff" or "Todd") is a former Bitcoin Core developer
5 and an applied cryptography consultant. Todd regularly speaks at conferences
6 throughout the world regarding his work in cryptography.

7 2. Defendant Sarah Michelle Reichwein ("Defendant"), who goes by the
8 fictitious name Isis Agora Lovecraft, is a self-described "anarchist; hacker; once-upon-a-
9 time theoretical physicist." Like Todd, Defendant regularly attends cryptography
10 conferences.

11 3. Todd and Defendant are acquaintances, having interacted on multiple
12 occasions at cryptography conferences and social events.

13 4. In or around June 2016, Defendant publicly accused third party Jacob
14 Appelbaum of sexually assaulting her.

15 5. When Todd did not publicly condemn Appelbaum, Defendant published
16 false statements about Todd on her Twitter profile accusing Todd of rape and sexual
17 assault.

18 6. Defendant's statements are false as Todd has never raped or sexually
19 assaulted anyone.

20 7. Defendant's statements accusing Todd of rape and sexual assault remain
21 publicly viewable on Defendant's Twitter profile.

22 8. Todd has been harmed and continues to be harmed by Defendant's
23 defamatory statements.

24 JURISDICTION AND VENUE

25 9. This Court has subject matter jurisdiction over this action pursuant to 28
26 U.S.C. §1332. Plaintiff Peter Todd is a citizen of a foreign state, namely Canada, and has
27 not been admitted for permanent residence in the United States. On information and
28 belief, Defendant is a citizen of California in that she is a citizen of the U.S. and a

domiciliary of California. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

10. Venue is proper pursuant to 28 U.S.C. §1391 because, on information and belief, Defendant resides in this district.

11. This Court has personal jurisdiction over Defendant, because, on information and belief, Defendant resides in California and has substantial, continuous, and systematic contacts with California.

INTRADISTRICT ASSIGNMENT

12. Because a substantial part of the events which give rise to Plaintiff's claim occurred in Alameda County, pursuant to Local Civil Rule 3-2, this action should be assigned to the San Francisco or Oakland Division.

PARTIES

13. Plaintiff Peter Todd is an individual and a citizen of Canada, residing in Ontario, Canada.

14. On information and belief, Defendant Sarah Michelle Reichwein, who goes by the fictitious name Isis Agora Lovecraft, is an individual, a U.S. citizen, and a domiciliary of California.

FACTUAL ALLEGATIONS

15. Todd is a Bitcoin enthusiast and expert, consultant, and a leading developer of cryptocurrency and blockchain software.

16. Todd is highly-regarded in the cryptography and cryptocurrency sectors for his expertise in the security properties of the Bitcoin network and other decentralized technologies.

17. Given his standing in the cryptography and cryptocurrency sectors, Todd is regularly invited to speak at cryptography conferences throughout the world.

18. Additionally, Todd provides professional consulting services in cryptography and cryptocurrency, for which he receives a premium in compensation based on his knowledge and experience.

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2 Twitter profile under the handle @peterktodd, where he has numerous followers in the
3 cryptography and cryptocurrency sectors.

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5 his standing in the cryptography community and his ability to maintain his consulting
6 profession.

7 21. Defendant is a self-described "anarchist; hacker; once-upon-a-time
8 theoretical physicist."

9 22. Defendant previously worked for The Tor Project, Inc., the goal of which is
10 to provide a way of using the Internet with as much privacy as possible, including by
11 routing Internet traffic through multiple servers and encrypting it each step of the way.

12 23. Like Todd, Defendant regularly attends cryptography conferences.

13 24. Todd initially met Defendant at the Summer 2014 Tor Dev Meeting, a
14 conference regarding the anonymizing software Tor.

15 25. Defendant disclosed her name to Todd as "Isis Agora Lovecraft." Todd
16 recognized the name as a pseudonym, as the use of pseudonyms is a common practice
17 in the cryptography community. Todd only discovered Defendant's actual name right
18 before filing this Complaint, after he engaged a private investigator to find that information
19 for purposes of bringing this lawsuit.

20 26. Between 2014 and 2016, Todd and Defendant had intermittent in-person
21 contact when they attended cryptography conferences.

22 27. Additionally, between 2014 and 2016, Todd and Defendant spent time
23 together socially on a few occasions.

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25 including via Twitter and Pond, an encrypted messaging application.

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27 profile that third party Jacob Appelbaum had sexually assaulted her. Appelbaum is a
28 cryptography expert and was a core member of the Tor Project.

30. Initially, Todd published statements to Defendant commending her on her bravery and denouncing sexual violence. Defendant reflected her approval of Todd's statements, liking one of Todd's Twitter comments.

31. In August 2016, Todd publicly stated that he did not know what was true regarding Defendant's and others' allegations against Appelbaum.

32. Around that same time, Defendant blocked Todd from viewing her Twitter profile.

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34. In response to Todd's request, Defendant published the following statement:

"First things first: @petertodd, you've publicly, repetitively defended a man who raped me and several other people, and disparaged the victims who were brave enough to come forward with their stories. **Do not speak to me. Do not use work as an excuse to speak to me. Do not use cryptography as an excuse to speak to me.**"

(emphasis in original).

35. Thereafter, Todd did not initiate any contact with Defendant, either in person or electronically.

36. On February 5, 2019, Defendant published the following statement on her Twitter profile at <<https://twitter.com/isislovecruft/status/1093033203219148800>>:

"This is not even touching upon the stories of the rape and assault survivors of you and @petertodd and @ioerror and you all have been seen to behave conveniently alike and seen to dutifully protect one another 🙄."

37. On February 8, 2019, Defendant published the following statement on her

1 Twitter profile at <<https://twitter.com/isislovecruft/status/1094091846047985666>> as a
2 follow up to her February 5, 2019 statement:

3 “i love watching the men in my industry who’ve sexually abused me and
4 many others squirm as I take them out one by one while they nervously
5 await their turn [¶] hahahahahahahaha eat goat dung you epoxy brained
6 cowards.”

7 38. On February 20, 2019, Defendant published the following statement on her
8 Twitter profile at <<https://twitter.com/isislovecruft/status/1098270385148022784>>:

9 “Nadim Kobeissi is a serial rapist and abuser who defends other rapists
10 including Jacob Appelbaum and Peter Todd and in 2012 he grabbed my
11 face and force kissed me at a conference and i absolutely believe the
12 multiple survivors i’ve personally spoken with since then.”

13 39. On February 20, 2019, Defendant published the following statement on her
14 Twitter profile at <<https://twitter.com/isislovecruft/status/1098280935353606144>>:

15 “yes, similar to Nadim, i personally have a story about Peter Todd and i’ve
16 personally spoken with survivors with absolutely awful and horrifying reports
17 who are terrified of him and of coming forward (rightly so) [¶] i however am
18 not afraid and shitty dudes are going down”

19 (the “Statement(s)”).

20 40. The Statements contain and comprise false assertions of fact.

21 41. Contrary to the Statements, Todd has not raped Defendant or anybody else.

22 42. Contrary to the Statements, Todd has not sexually assaulted or otherwise
23 assaulted Defendant or anybody else.

24 43. Defendant’s Twitter profile has over 20,000 followers.

25 44. Numerous people have viewed Defendant’s Statements, and numerous
26 people have publicly commented on Defendant’s Statements.

27 45. Defendant knew that her Statements were false when she made them
28 because Defendant knew that Todd had never raped her or sexually abused her.

1 Alternatively or additionally, Defendant acted in reckless disregard of the falsity of her
2 Statements when she published them because the Statements falsely represent that
3 Todd engaged in the most serious of misconduct, because Defendant had no credible
4 evidence supporting her Statements when she published them, and because Defendant's
5 social history with Todd contradicted the Statements.

6 46. As of the filing of this Complaint, the Statements remain publicly viewable
7 on Defendant's Twitter profile.

8 47. Todd has been harmed by Defendant's Statements, including shame,
9 embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
10 reputation among his friends, peers, and professional community.

11 48. Additionally, and on information and belief, Todd has lost business and
12 professional opportunities, including conference speakerships, because of Defendant's
13 Statements.

14 **FIRST CAUSE OF ACTION**
15 **(Defamation Under California Law)**

16 49. Todd repeats and incorporates by reference the allegations in Paragraphs
17 1–48 above.

18 50. Todd is a private figure in that he has not voluntarily injected himself into a
19 public controversy, and he has not achieved fame that reaches widely and pervasively
20 throughout society.

21 51. Defendant published the defamatory Statements about Todd in at least the
22 four Twitter posts identified herein and dated February 5, 2019, February 8, 2019, and
23 February 20, 2019 (2).

24 52. Numerous people have viewed the Statements on Defendant's Twitter
25 profile.

26 53. The Statements contain false assertions of fact, including that Todd raped
27 and/or sexually assaulted Defendant and/or other people.

28 54. The Statements are false in that Todd has never raped or sexually



1 assaulted Defendant or any other person.

2 55. Defendant acted with malice when she published the defamatory
3 Statements. To wit, Defendant knew that her defamatory Statements were false when
4 she made them because Defendant knew the true state of affairs relating to Todd. In the
5 alternative, Defendant acted recklessly regarding the falsity of her Statements where the
6 Statements alleged that Todd engaged in the most serious of misconduct, where
7 Defendant had no credible evidence supporting her Statements, and where Defendant's
8 social history with Todd contradicted the Statements.

9 56. Defendant acted without any privilege when she published the defamatory
10 Statements.

11 57. The defamatory Statements constitute defamation per se because the
12 Statements: a) falsely charge Todd with committing illegal acts (i.e., rape; sexual assault),
13 b) contain charges by implication from the language employed such that the reader would
14 understand the defamatory meaning without the necessity of knowing extrinsic
15 explanatory matter, and c) by natural consequence would cause Todd actual damages.

16 58. On information and belief, Defendant published the defamatory
17 Statements willfully and maliciously with the intent to harm Todd.

18 59. As a result of Defendant's defamatory Statements, Todd has suffered
19 shame, embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
20 reputation among his friends, peers, and in his professional community.

21 60. Additionally, on information and belief, Todd has lost professional
22 opportunities, including conference speakerships, because of Defendant's Statements.

23 61. Defendant's defamatory Statements remain viewable on her public Twitter
24 profile as of the filing of this Complaint and continue to cause harm to Todd that cannot
25 be addressed by monetary damages alone.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff Peter Todd respectfully requests that the Court enter
28 judgment in favor of Plaintiff and against Defendant and award the following relief to

Plaintiff and against Defendant:

1. A permanent injunction requiring Defendant to remove defamatory publications she has made about Plaintiff;

2. An award of damages to Plaintiff and against Defendant in an amount to be proved at trial, comprising the following:

- a. Compensatory damages under California law, including California Civil Code section 3281;
- b. Punitive damages pursuant to California Civil Code section 3294;
- c. Plaintiff's costs of suit;
- d. Pre-judgment interest to the extent allowed by law; and

3. Such other and additional relief as the Court deems just and proper.

Respectfully Submitted,

DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

Attorneys for Plaintiff Peter Todd



DEMAND FOR JURY TRIAL

Plaintiff, by and through his undersigned counsel, hereby demands a trial by jury for all questions of fact that can be decided by a jury in the above-entitled action.

Respectfully Submitted,

DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

Attorneys for Plaintiff Peter Todd

I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff Ontario, Canada
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

s/Jeffrey M. Rosenfeld

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
 - c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket.
- Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”

Date and Attorney Signature. Date and sign the civil cover sheet.

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (Bar No. 226112)

Jeffrey M. Rosenfeld (Bar No. 222187)

Liana W. Chen (Bar No. 296965)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

jeff@KRInternetLaw.com

liana@KRInternetLaw.com

Attorneys for Plaintiff Peter Todd

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PETER TODD, an individual,

Plaintiff,

v.

SARAH MICHELLE REICHWEIN *aka* **ISIS
AGORA LOVECRUFT**, an individual,

Defendant.

Case No. 3:19-cv-01751

**PLAINTIFF PETER TODD'S
CERTIFICATION OF INTERESTED
ENTITIES OR PERSONS**



1 Pursuant to Civil L.R. 3-15, the undersigned certifies that as of this date, other than
2 the named parties, there is no such interest to report.

3
4 Respectfully Submitted,

5 DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

6
7 By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

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9 Attorneys for Plaintiff Peter Todd
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From: ECF-CAND@cand.uscourts.gov
To: efiling@cand.uscourts.gov
Subject: Activity in Case 3:19-cv-01751-DMR Todd v. Reichwein Case Assigned by Intake
Date: Wednesday, April 3, 2019 12:48:10 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered on 4/3/2019 at 12:47 PM and filed on 4/3/2019

Case Name: Todd v. Reichwein

Case Number: [3:19-cv-01751-DMR](#)

Filer:

Document Number: 4(No document attached)

Docket Text:

Case assigned to Magistrate Judge Donna M. Ryu.

Counsel for plaintiff or the removing party is responsible for serving the Complaint or Notice of Removal, Summons and the assigned judge's standing orders and all other new case documents upon the opposing parties. For information, visit *E-Filing A New Civil Case* at <http://cand.uscourts.gov/ecf/caseopening>.

Standing orders can be downloaded from the court's web page at www.cand.uscourts.gov/judges. Upon receipt, the summons will be issued and returned electronically. Counsel is required to send chambers a copy of the initiating documents pursuant to L.R. 5-1(e)(7). A scheduling order will be sent by Notice of Electronic Filing (NEF) within two business days. Consent/Declination due by 4/17/2019. (ajsS, COURT STAFF) (Filed on 4/3/2019)

3:19-cv-01751-DMR Notice has been electronically mailed to:

Jeffrey Michael Rosenfeld Jeff@KRInternetlaw.com

3:19-cv-01751-DMR Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PETER TODD,
Plaintiff,

v.

SARAH MICHELLE REICHWEIN,
Defendant.

Case No. 19-cv-01751-DMR

**ORDER SETTING INITIAL CASE
MANAGEMENT CONFERENCE
AND ADR DEADLINES**

IT IS HEREBY ORDERED that this action is assigned to the Honorable Donna M. Ryu . When serving the complaint or notice of removal, the plaintiff or removing defendant must serve on all other parties a copy of this order, the Notice of Assignment of Case to a United States Magistrate Judge for Trial, and all other documents specified in [Civil Local Rule 4-2](#). Plaintiffs or removing parties must file a consent or declination to proceed before a magistrate judge within 14 days of the filing of the complaint or the removal. All other parties must file a consent or declination within 14 days of appearing in the case. All parties who have made an appearance must file a consent or declination within 7 days of the filing of a dispositive motion or the case will be reassigned to a district court judge. Counsel must comply with the case schedule listed below unless the Court otherwise orders.

IT IS FURTHER ORDERED that this action is assigned to the Alternative Dispute Resolution (ADR) Multi-Option Program governed by [ADR Local Rule 3](#). Counsel and clients shall familiarize themselves with that rule and with the material entitled "Dispute Resolution Procedures in the Northern District of California" on the Court ADR Internet site at <http://www.cand.uscourts.gov/adr>. A limited number of printed copies are available from the Clerk's Office for parties in cases not subject to the court's Electronic Case Filing program (ECF).

IT IS FURTHER ORDERED that plaintiff or removing defendant serve upon all parties

the brochure entitled "Consenting To A Magistrate Judge's Jurisdiction In The Northern District Of California", additional copies of which can be downloaded from the court's Internet website:

<http://www.cand.uscourts.gov>.

CASE SCHEDULE – ADR MULTI-OPTION PROGRAM

Date	Event	Governing Rule
4/3/2019	Complaint Filed	
6/12/2019	*Last day to: <ul style="list-style-type: none"> meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan 	FRCivP 26(f) & ADR L.R.3-5
	<ul style="list-style-type: none"> file ADR Certification signed by Parties and Counsel (form available at http://www.cand.uscourts.gov) 	Civil L.R. 16-8(b) & ADR L.R. 3-5(b)
6/26/2019	**Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (also available at http://www.cand.uscourts.gov)	FRCivP 26(a) (1) Civil L.R. 16-9
7/3/2019	INITIAL CASE MANAGEMENT CONFERENCE (CMC) at 1:30 PM in: Courtroom 4, 3rd Floor Ronald Dellums Federal Building 1301 Clay Street Oakland, CA 94612	Civil L.R. 16-10

* If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 21 days in advance of the Initial Case Management Conference.

** If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 7 days in advance of the Initial Case Management Conference.



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT OF CASE
TO A UNITED STATES MAGISTRATE JUDGE FOR TRIAL

Pursuant to General Order 44, the Assignment Plan of the United States District Court for the Northern District of California, this case has been randomly assigned to a Magistrate Judge.

Pursuant to 28 U.S.C. § 636(c), with written consent of all parties, a magistrate judge may conduct all proceedings in a case, including all pretrial and trial proceedings, entry of judgment and post-trial motions. Appeal will be directly to the United States Court of Appeals for the Ninth Circuit.

Attached is a form to complete to indicate whether you consent to proceed before the assigned magistrate judge or decline to proceed before the assigned magistrate judge. This form is also available from the Court's website: cand.uscourts.gov/civilforms. You are free to withhold consent without adverse consequences. If any party declines, the case will be reassigned to a district judge.

If you are the plaintiff or removing party in this case, you must file your consent/declination form within 14 days of receipt of this notice. Each other party must file its consent/declination form within 14 days of appearing in the case.

The plaintiff or removing party must serve a copy of this notice upon all other parties to this action.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. C

CONSENT OR DECLINATION
TO MAGISTRATE JUDGE
JURISDICTION

Plaintiff(s)
v.
Defendant(s).

INSTRUCTIONS: Please indicate below by checking **one** of the two boxes whether you (if you are the party) or the party you represent (if you are an attorney in the case) choose(s) to consent or decline magistrate judge jurisdiction in this matter. Sign this form below your selection.

☐ **Consent to Magistrate Judge Jurisdiction**

In accordance with the provisions of 28 U.S.C. § 636(c), I voluntarily **consent** to have a United States magistrate judge conduct all further proceedings in this case, including trial and entry of final judgment. I understand that appeal from the judgment shall be taken directly to the United States Court of Appeals for the Ninth Circuit.

OR

☐ **Decline Magistrate Judge Jurisdiction**

In accordance with the provisions of 28 U.S.C. § 636(c), I **decline** to have a United States magistrate judge conduct all further proceedings in this case and I hereby request that this case be reassigned to a United States district judge.

DATE: _____

NAME: _____

COUNSEL FOR
(OR "PRO SE"): _____

Signature

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

Consenting To The Jurisdiction Of A Magistrate Judge



Oakland



San Francisco



San Jose



Eureka

Phyllis J. Hamilton, Chief Judge
Susan Y. Soong, Clerk of Court

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Phyllis J. Hamilton, Chief Judge

Susan Y. Soong, Clerk of Court

San Francisco Courthouse

450 Golden Gate Avenue

San Francisco, California 94102

Phone: 415-~~5~~22-2000

Fax: 415-~~5~~22-3605

Oakland Courthouse

1301 Clay Street, Suite 400S

Oakland, California 94612-~~5~~212

Phone: 510-~~5~~37-3530

Fax: 510-~~5~~37-3545

San Jose Courthouse

280 South First Street, Room 2112

San Jose, California 95113

Phone: 408-~~5~~35-5364/5363

Fax: 408-~~5~~35-5360

Eureka Courthouse

3140 Boeing Avenue

McKinleyville, California 95519

Phone: 707-~~4~~45-3612

Fax: 707-~~4~~41-1659

A MESSAGE FROM THE CHIEF JUDGE OF THE UNITED STATES DISTRICT COURT

As you embark on civil litigation in the United States District Court for the Northern District of California—whether as a party to a lawsuit or as an attorney—I encourage you to familiarize yourself with the range of services provided by the court’s magistrate judges and especially to consider consenting to have a magistrate judge handle all aspects of your case, up to and including dispositive motions, jury or court trial and the entry of judgment.

The Northern District was one of the first federal trial courts in the country to assign a wide range of civil cases directly to magistrate judges upon filing. As a consequence, the magistrate judges have direct experience with nearly all types of civil matters filed in our court. Because our court is very busy, agreeing to proceed before a magistrate judge often means that the case will be resolved more quickly than if the case remained before a district judge. If the case must be tried, your trial date will be more certain and less likely to be continued to accommodate a felony jury trial. While consent is customarily given soon after a case is filed, parties may consent to have a magistrate judge preside over their case at any point in the proceedings.

Every magistrate judge in the Northern District underwent a highly competitive selection process and had years of experience before being appointed to the bench.



As the biographies that follow demonstrate, each is active in law school teaching and continuing legal education for attorneys. Many have been appointed to important committees within the circuit and national governing bodies and all are active in local court governance.

Each has been appointed based on detailed, confidential feedback from the bar and the community; each is equipped to handle the full range of issues presented to our court. Combined, the Northern District’s magistrate judges bring thousands of hours of federal judicial experience to their work at our court.

Phyllis J. Hamilton
Chief Judge

HOW CONSENT JURISDICTION WORKS

Under a law passed by Congress in 1976, the parties in a civil action in federal district court have the option of consenting to have the case handled by a United States magistrate judge. Magistrate judges are appointed by the district judges of each district court following a competitive merit selection process and serve for terms of eight years. Magistrate judges may be reappointed only after a rigorous review of their work that includes community input. In contrast, district judges are appointed by the President and confirmed by the Senate and serve without term limits.

With the exception of certain types of cases (including capital habeas corpus cases, securities class actions and bankruptcy appeals), when a civil action is filed in the Northern District of California, it is randomly assigned to either a district judge or a magistrate judge. For every case assigned to a magistrate judge, all parties (that is, all plaintiffs and all defendants) are asked to consent to have the case handled by a magistrate judge all the way through trial. The parties are encouraged to make a decision regarding magistrate judge jurisdiction as soon as possible and no later than the first case management conference (about

100 days after the case is filed). If any party does not consent, the case is reassigned to a district judge.

If all parties consent to magistrate judge jurisdiction, then the assigned magistrate judge presides over all aspects of the case and any appeals from magistrate judges' rulings are made directly to the Court of Appeals, as are rulings by district judges.

Sometimes cases initially assigned to district judges are reassigned to magistrate judges because all parties consent to magistrate judge jurisdiction. The district judge may invite the parties at the initial case management conference to consider consenting to the jurisdiction of a magistrate judge, and the parties may take that opportunity to do so.

The magistrate judges of the Northern District handle hundreds of civil cases every year. Each magistrate judge has an assigned courtroom and dedicated staff, including a courtroom deputy and law clerks. Because of their diverse professional experiences before and during their service as judges, this court's magistrate judges are well-qualified to preside over all types of civil litigation.

POTENTIAL BENEFITS OF CONSENTING TO A MAGISTRATE JUDGE

When parties consent to have their case tried before a magistrate judge, they receive a date certain for trial. Because district judges must give priority to holding trials in felony criminal matters, district judges must frequently postpone scheduled civil trials. Because magistrate judges do not preside over felony criminal matters, they need not move their trial dates to accommodate criminal trials. This is one of the advantages of having a case handled by a magistrate

judge rather than a district judge. In fact, the court's magistrate judges nearly always meet their scheduled trial dates.

Also, civil cases assigned to magistrate judges generally move along at a quicker pace. Because magistrate judges' trial dockets are generally less crowded than those of district court judges, magistrate judges are often able to schedule trial within one year of the filing of the complaint.



Laws And Court Rules About United States Magistrate Judge Jurisdiction ...

- * Federal Magistrate Act of 1979, 28 U.S.C. § 636(c)(1)
- * Federal Rule of Civil Procedure 73
- * Northern District of California Civil Local Rule 73

MAGISTRATE JUDGE BIOGRAPHIES

SAN FRANCISCO COURTHOUSE

Magistrate Judge Laurel Beeler

Magistrate Judge Jacqueline Scott Corley

Magistrate Judge Thomas S. Hixson

Magistrate Judge Sallie Kim

Magistrate Judge Elizabeth Laporte

Chief Magistrate Judge Joseph Spero

OAKLAND COURTHOUSE

Magistrate Judge Donna M. Ryu

Magistrate Judge Kandis Westmore

SAN JOSE COURTHOUSE

Magistrate Judge Nathanael Cousins

Magistrate Judge Virginia K. DeMarchi

Magistrate Judge Susan van Keulen

EUREKA-MCKINLEYVILLE COURTHOUSE

Magistrate Judge Robert M. Illman

MAGISTRATE JUDGE
LAUREL BEELER

San Francisco Courthouse

Year Appointed: 2010



Magistrate Judge Laurel Beeler has presided as a trial and settlement judge over hundreds of civil cases, including intellectual property, civil rights, employment, and business disputes.

Judge Beeler was an assistant U.S. attorney in the Northern District, prosecuting complex white-collar cases with parallel civil components. She was the Office's Professional Responsibility Officer and Deputy Chief of the Criminal Division. She was a law clerk to the Hon. Cecil F. Poole, United States Court of Appeals for the Ninth Circuit, and the Civil Appeals Division Chief at the 9th Circuit's Office of Staff Attorneys. She trained as a mediator with the Northern District's ADR Program, the Federal Judicial Center, and Harvard Law School.

Judge Beeler is a member of the 9th Circuit Magistrate Judge Executive Board and the 9th Circuit Criminal Case Committee and is one of four national judicial liaisons to the U.S. Department of Justice/Office of Defender Services Joint Electronic Technology Working Group. She chairs the Northern District's Criminal Practice Committee and implemented the Court's reentry and diversion courts.

Judge Beeler served as President of the Federal Bar Association, co-chair of the Lawyer Representatives to the 9th Circuit, a board member of the Bar Association of San Francisco, a member of the 9th Circuit's Jury Trial Improvement Committee and a member of the Executive Committee of the Edward J. McFetridge American Inn of Court. In 2006, Judge Beeler received the Northern District Judicial Conference's Public Service Award. In 2012, she was named one of The Recorder's "2012 Women Leaders in Law." In 2015, she received the Barrister's Choice Award from the Bar Association of San Francisco. Judge Beeler taught civil trial practice at U.C. Berkeley School of Law and Criminal Procedure at U.C. Hastings College of the Law. She has led rule-of-law projects in Indonesia, Vietnam, Cambodia, Jordan, the Philippines, Ukraine, and Turkey.

Judge Beeler graduated with honors from the University of Washington School of Law, where she was Order of the Coif and an Articles Editor on the *Washington Law Review*. She received her A.B. with honors from Bowdoin College.



MAGISTRATE JUDGE
JACQUELINE SCOTT CORLEY

San Francisco Courthouse

Year Appointed: 2011

Magistrate Judge Jacqueline Scott Corley has been on the bench since 2011 and has presided over nearly every type of civil action at all stages of the proceedings, from motions to dismiss through jury trial. She has also served as a settlement judge in hundreds of cases.

Just prior to taking the bench, Judge Corley was a partner at Kerr & Wagstaffe, LLP in San Francisco as a civil litigator with an emphasis on federal practice. She represented individuals, government entities, and institutions as plaintiffs and defendants in a variety of matters that included trademark, copyright, patent, constitutional law, defamation, malicious prosecution, class actions, contract and probate.

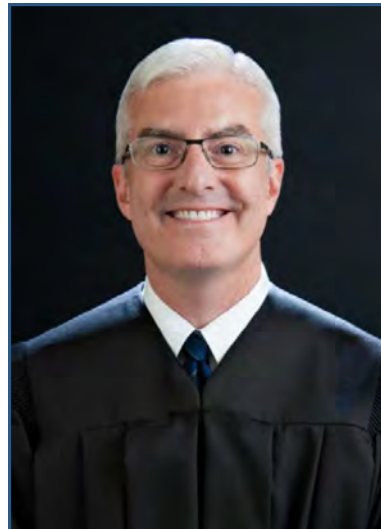
From 1998 through 2009 Judge Corley served as a career law clerk to the Honorable Charles R. Breyer. She also served on the Northern District of California Alternative Dispute Resolution mediation and early neutral evaluation panels from 2006 through her appointment.

Judge Corley received her undergraduate degree from the University of California Berkeley and her J.D. from Harvard Law School, magna cum laude, where she was an editor and Articles Chair of the *Harvard Law Review*. Upon graduation she served as a law clerk to the Honorable Robert E. Keeton of the United States District Court for the District of Massachusetts. She then practiced complex commercial litigation and white collar criminal defense at Goodwin, Procter LLP in Boston and was a litigation associate at Coblenz, Patch, Duffy & Bass LLP in San Francisco before joining Judge Breyer in 1998.

**MAGISTRATE JUDGE
THOMAS S. HIXSON**

San Francisco Courthouse

Year Appointed: 2018



Magistrate Judge Thomas S. Hixson joined the Court in 2018 following nearly 20 years as a litigator in private practice in San Francisco.

Before taking the bench, Magistrate Judge Hixson was a partner at Morgan, Lewis & Bockius, LLP, and before then an associate and then partner at Bingham McCutchen LLP, and prior to that an associate at McCutchen, Doyle, Brown & Enersen, LLP. His practice encompassed complex litigation in federal and state courts in fields including intellectual property, antitrust and unfair competition, energy regulation, water management and telecommunications.

Magistrate Judge Hixson is a past chair of the California State Bar Antitrust and Unfair Competition Law Section (now the Antitrust, UCL and Privacy Section of the California Lawyers Association). He has contributed to the Section's treatise, California State Antitrust & Unfair Competition Law, published by Matthew Bender. His pro bono work while in private practice included serving as counsel in a complex challenge to telecommunications marketing practices before the California Public Utilities Commission and assisting tenants facing eviction via the San Francisco Superior Court's Housing Negotiation Project. He also served on the Board of Directors of the AIDS Legal Referral Panel.

Magistrate Judge Hixson earned his undergraduate and law degrees, both magna cum laude, from Harvard. The year after graduating from law school, he served as a law clerk to Ninth Circuit Court of Appeals Judge A. Wallace Tashima in Pasadena.



MAGISTRATE JUDGE
SALLIE KIM

San Francisco Courthouse

Year Appointed: 2015

Magistrate Judge Sallie Kim brings a broad range of civil and criminal litigation experience to the bench, with a special emphasis on civil cases in federal court.

Judge Kim graduated from Princeton University in 1986 and from Stanford Law School in 1989. Upon graduation from law school, she served as law clerk to United States District Judge Spencer Williams of this Court. She then entered private civil litigation practice in Palo Alto. From 1995-99, Judge Kim served as Associate and Assistant Dean for Student Affairs at Stanford Law School, after which she returned to private civil litigation practice and became a partner with the law firm of GCA Law Partners, LLP in 2002. She practiced at GCA Law Partners until she joined the Court in 2015.

Judge Kim's recent professional activities outside of regular civil litigation practice have included service in the following capacities: Co-Director of the Trial Advocacy Program and Lecturer in Law at Stanford Law School beginning in 2014; the Interim Title IX Coordinator for Stanford University in 2013 and 2014; and Volunteer Deputy District Attorney for Santa Clara County for 14 weeks in 2010.

MAGISTRATE JUDGE
ELIZABETH D. LAPORTE
San Francisco Courthouse
Year Appointed: 1998



Magistrate Judge Elizabeth D. Laporte has presided over numerous civil cases through trial or other disposition since her appointment in 1998, including patent, trademark, copyright, employment, civil rights and environmental cases and has conducted over 1000 settlement conferences. She received the Judicial Leadership award for the Electronic Discovery Institute in 2015.

A 1982 graduate of Yale Law School and a Marshall Scholar, she clerked for the Honorable Marilyn Hall Patel of this Court. She was a partner at the boutique litigation firm of Turner & Brorby and an Administrative Law Judge for the California Department of Insurance. From 1996-98, she was the first Chief of Special Litigation for the San Francisco City Attorney's Office, and was named a Lawyer of the Year by California Lawyer.

Judge Laporte serves on the editorial board of the Federal Courts Law Review, the Board of Governors for the Northern California Chapter of the Association of Business Trial Lawyers and the Judicial Advisory Board of The Sedona Conference.

Judge Laporte is the immediate past Chief Magistrate Judge and has served as the Court's Alternative Dispute Resolution Magistrate Judge and chaired the Rules Committee's E-Discovery Subcommittee. At the Ninth Circuit Court of Appeals, Judge Laporte has chaired the Magistrate Judge Executive Board and served on the Jury Trial Improvement Committee. She regularly speaks at legal conferences and judicial education programs on e-discovery, employment law, intellectual property, settlement, and other topics and has authored articles on patent litigation, settlement and e-discovery.



CHIEF MAGISTRATE JUDGE
JOSEPH C. SPERO

San Francisco Courthouse

Year Appointed: 1999

Chief Magistrate Judge Joseph C. Spero has presided as trial judge in criminal and civil cases in a variety of subject areas, including patent, employment, civil rights, commercial contract, trademark, and federal misdemeanor cases. He has also served as a settlement judge in over 1500 cases.

Judge Spero serves on the Court's Executive Committee, as Chair of the Court's Reentry Committee and of the Diversion Committee, and has served as Chair of the Court's Technology Committee, and as Liaison Judge for Pretrial Services and Probation. He also has served on various circuit and national committees including the Magistrate Judges Advisory Group of the Administrative Office of the Courts, the Magistrate Judge Executive Board, and the Capital Case Committee of the Ninth Circuit.

A 1981 graduate of Columbia University School of Law, he clerked for the United States Court of Appeals for the Ninth Circuit. He worked as an associate at Skadden, Arps, Slate, Meagher & Flom, and as associate then partner at Coblenz, Cahen, McCabe & Breyer (now Coblenz, Patch, Duffy & Bass).

While in private practice, he trained as a mediator at Harvard Law School and served as a mediator in the Northern District's Alternative Dispute Resolution Program. He also served as a Judge Pro-Tem for the San Francisco County Superior Court.

Judge Spero served as pro bono counsel in a variety of cases. He received the Thurgood Marshall Award from the Bar Association of the City of New York.

MAGISTRATE JUDGE
DONNA M. RYU

Oakland Courthouse

Year Appointed: 2010



Magistrate Judge Donna M. Ryu joined the Northern District bench in March 2010, and has presided over consent cases in a wide variety of fields, including commercial disputes, intellectual property, employment, civil rights, insurance, personal injury, environmental, maritime, and constitutional law. She conducts settlement conferences in all major practice areas, and manages discovery in complex matters, including multi-district litigation. Judge Ryu has served on numerous court committees, including Local Rules, Subcommittee on E-Discovery, and Pro Bono Projects, among others. She also presides over the Oakland Reentry Court.

Judge Ryu began her career as a commercial litigator at a large San Francisco firm before joining an Oakland-based firm specializing in class actions, and later founding a small firm. She has extensive experience in complex civil litigation, including discovery, motions and trials. Prior to taking the bench, Judge Ryu was a Clinical Professor of Law at U.C. Hastings, and before that at Golden Gate University Law School.

She has been honored as a California Lawyer of the Year in Employment Law. She is the recipient of the Asian American Bar Association's Joe Morozumi Award for Exceptional Legal Advocacy, the Rutter Award for Excellence in Teaching, and the National Asian Pacific American Bar Association's Trailblazers Award. She co-designed a national training institute on class actions, and has written and lectured in the areas of employment law, e-discovery, pretrial practice, attorneys' fees, class actions, ethics, and professionalism.

Judge Ryu graduated with honors from Yale University, and received her law degree in from U.C. Berkeley Law School, where she continues to teach as a Lecturer.



MAGISTRATE JUDGE
KANDIS A. WESTMORE

Oakland Courthouse

Year Appointed: 2012

Magistrate Judge Kandis A. Westmore was appointed in February 2012 and is assigned to the Oakland Division. Judge Westmore served as a law clerk with the Contra Costa County Public Defender's Office before beginning her legal career at an Oakland-based boutique law firm specializing in plaintiffs' civil rights litigation.

She joined the Oakland City Attorney's Office in 1999 as a Deputy City Attorney. During her 13 year tenure with the City, she advised City agencies and served as both a trial attorney and a law and motion attorney, where she filed suit on behalf of the City and defended the City and its employees on a wide range of matters in federal and state trial and appellate courts, including civil rights, personal injury, inverse condemnation, labor and employment, and complex litigation. Judge Westmore has been publicly recognized by community organizations, the City of Oakland, and elected officials for her contributions and service to the City of Oakland and its residents.

Prior to taking the bench, Judge Westmore served as President-Elect of the Alameda County Bar Association (ACBA), and volunteered for the ACBA Volunteer Legal Services Corporation's Pro Bono Program representing low-income individuals in family law cases. She currently serves as a member of the court's Community Outreach Committee and co-leads the court's Conviction Alternatives Program (CAP).

She is also an adjunct professor at Golden Gate University School of Law, where she teaches Honors Evidence.

Judge Westmore received her B.A. from U.C. Berkeley in 1989, and her J.D. from the University of San Francisco, School of Law in 1997, all while working full-time and being a wife and mother of two young children. As a law student, Judge Westmore served as a judicial extern to the Honorable Sandra Brown Armstrong of this Court.

MAGISTRATE JUDGE
NATHANAEL COUSINS

San Jose Courthouse

Year Appointed: 2011



Magistrate Judge Nathanael Cousins has his chambers in San Jose, but he has served in each courthouse in the Northern District of California, from Salinas to Eureka.

He joined the Court from the U.S. Department of Justice, where he worked as an Assistant U.S. Attorney (San Jose and San Francisco offices) and Antitrust Division Trial Attorney (San Francisco). In those positions, he had criminal jury trials before many of the Judges of this Court. He was part of the team that prosecuted global price-fixing cartels in memory chip markets. He also coordinated Operation Ceasefire, a community program to reduce gang violence in Monterey County.

Immediately before joining the Department of Justice, he worked as a civil litigation associate and then partner in the Chicago office of Kirkland & Ellis, and before that he was a litigation associate in the Los Angeles office of Greenberg Glusker. His civil litigation cases focused on antitrust, class actions, consumer fraud, securities fraud, and civil rights. He was pro bono class counsel for inmates at an Illinois state prison.

Judge Cousins graduated from the University of California, Hastings College of the Law. After law school, he clerked for the Hon. F.A. Little, Jr., Chief Judge of the U.S. District Court, Western District of Louisiana. He received his undergraduate degree in political science from Stanford. While in school, he studied abroad in Russia and the Netherlands.

Judge Cousins has taught legal writing, moot court, and antitrust law at Hastings, and participates regularly in moot court and trial training programs at Bay Area law schools. He also coaches basketball and soccer.



MAGISTRATE JUDGE
VIRGINIA K. DEMARCHI

San Jose Courthouse

Year Appointed: 2018

Magistrate Judge Virginia DeMarchi joined the court in 2018 after 22 years as a litigator in private practice in Silicon Valley.

Before taking the bench, Magistrate Judge DeMarchi was a partner with Fenwick & West LLP where she represented technology and life sciences companies in patent infringement and other intellectual property matters in a wide range of industries, including e-commerce, computer hardware and software, industrial enzymes, pharmaceuticals, medical devices, financial services, communications, and consumer products. She also served as general counsel to the firm and as a member of the executive committee.

In addition to her private law practice, Magistrate Judge DeMarchi served for nearly 10 years on the board of directors for the Law Foundation of Silicon Valley and has been active in pro bono representation of federal and state inmates and victims of domestic violence.

Before joining Fenwick & West, Magistrate Judge DeMarchi served for two years as a trial attorney with the Civil Division of the United States Department of Justice in Washington, D.C. and clerked for District Judge Steven J. McAuliffe in the District of New Hampshire. Magistrate Judge DeMarchi earned her law degree cum laude from Harvard Law School and her undergraduate degree with honors from Stanford University.

**MAGISTRATE JUDGE
SUSAN VAN KEULEN**

San Jose Courthouse

Year Appointed: 2017



Magistrate Judge Susan van Keulen joined the Court following 28 years as a commercial and intellectual property litigator in Silicon Valley.

Magistrate Judge van Keulen's private law practice focused substantially on intellectual property cases in federal and state courts and in private arbitrations, with particular experience handling technology and commercial disputes involving semiconductor, computer, and electronics technologies. Magistrate Judge van Keulen prepared dozens of cases for trial and served as lead trial counsel in a number of cases in the Northern District. As an active part of her practice, she has also regularly represented pro bono clients in cases involving landlord-tenant disputes, immigration issues and legal remedies for domestic violence.

In addition to her active law practice, Magistrate Judge van Keulen served on the Northern District's Patent Local Rules Advisory Subcommittee from 2006 to 2014 and has lectured and written widely on antitrust and patent law and federal procedure.

Magistrate Judge van Keulen graduated from the University of California, Davis and UCLA School of Law, then practiced law with the Thelen law firm (1988-2008) and then as a partner with O'Melveny & Myers where she served as Litigation Practice Leader at the Silicon Valley office until taking the bench.

**MAGISTRATE JUDGE
ROBERT M. ILLMAN**

Eureka-McKinleyville Courthouse

Year Appointed: 2017



Magistrate Judge Robert M. Illman was appointed to the bench in 2017. Prior to taking the bench, Judge Illman served as a law clerk to Magistrate Judge Nandor J. Vadas in the Northern District of California from 2014 to 2017, and to Chief Magistrate Judge Wallace Capel, Jr. of the United States District Court for the Middle District of Alabama from 2007 to 2014. Prior to that, Judge Illman served as an Assistant Federal Public Defender in Montgomery, Alabama, from 2003 to 2007. In that role he represented indigent defendants charged with various crimes in federal trial and appellate courts, as well as representing Alabama's death row inmates in their federal habeas corpus litigation. Through his broad background as an attorney working for and practicing in the federal courts, Judge Illman has developed extensive experience in all manner of cases brought before the district court.

Judge Illman graduated with a degree in history from Covenant College in Lookout Mountain, Georgia, and from the University of Alabama School of Law in Tuscaloosa, Alabama.

All new civil and criminal actions arising in the counties of Del Norte, Lake, Humboldt, and Mendocino are assigned directly to Judge Illman, subject to consent under 28 USC § 636(c)(1). Magistrate Judge Illman can hold case management conferences and hear many types of motions by video-conference if parties prefer to appear in San Francisco rather than travel to McKinleyville. In addition, parties can schedule dispositive motions to be heard on days when Judge Illman is in San Francisco.

If you have additional questions about magistrate judge jurisdiction, please contact the Clerk's Office:

Phone: 415-~~5~~22-2045

Fax: 415-~~5~~22-2176

This brochure is available on the Court's website: cand.uscourts.gov.

Print copies are available at all of the Court's four courthouses.

The magistrate judge portraits in this brochure
were taken by Roslyn Banish.

The courthouse photos were taken by court staff members.

Date of printing: **October 25, 2018**

**STANDING ORDER FOR
MAGISTRATE JUDGE DONNA M. RYU**
(Revised March 6, 2019)

Parties shall comply with the procedures in the Federal Rules of Civil or Criminal Procedure, the Northern District of California's Local Rules and General Orders, and this standing order, all of which are available at <http://www.cand.uscourts.gov>. Failure to comply may result in monetary sanctions, dismissal, entry of judgment, or other appropriate sanctions.

CALENDAR DATES AND SCHEDULING

1. Civil and criminal motions normally are heard on the second and fourth Thursdays of the month at 11:00 a.m. Criminal motions may also be heard directly following the criminal calendar, when Judge Ryu is on criminal calendar duty. Civil case management conferences are heard on the first, third, and fifth Wednesdays of the month at 1:30 p.m.
2. Parties should notice motions (other than discovery motions) pursuant to the local rules. Parties need not reserve a hearing date, but should confirm availability at <http://www.cand.uscourts.gov> by consulting Judge Ryu's calendar and scheduling notes. The court may reset hearing dates as the court's calendar requires. Parties seeking to enlarge a filing deadline by filing a motion for administrative relief pursuant to Civil Local Rule 7-11 should file the motion in advance of the filing deadline, rather than on the day a filing is due. Requests that, in effect, do not leave at least two weeks between the filing of the last brief and the scheduled hearing date are routinely denied.
3. For scheduling questions, please call Judge Ryu's courtroom deputy, Ivy Garcia, at (510) 637-3639.

CONSENT CASES

4. In civil cases that are randomly assigned to Judge Ryu for all purposes, each party should file a written consent to the assignment of a United States Magistrate Judge for all purposes, or written declination of consent, as soon as possible. If a party files a dispositive motion (such as a motion to dismiss or a motion for remand), the moving party must file the consent or declination simultaneously with the motion. In no event shall the consent or declination be filed later than the deadlines specified in Civil L.R. 73-1(a)(1) and (2).

CHAMBERS COPIES AND PROPOSED ORDERS

5. Pursuant to Civil L.R. 5-1(e)(7) and 5-2(b), parties must lodge an extra paper copy of certain filings and mark it as a copy for "**DMR Chambers**." All chambers copies should be double-sided (when possible), three-hole punched along the left side of the page, and should bear the ECF filing "stamp" (case number, docket number, date, and ECF page number) along the top of the page. All exhibits shall be clearly delineated with labels along the right side. If the filing includes exhibits over two inches thick, the parties shall place the chambers copy in a binder.

6. Any stipulation or proposed order submitted by an e-filing party shall be submitted by email to dmrpo@cand.uscourts.gov as a word processing attachment on the same day the document is e-filed. This address should only be used for this stated purpose unless otherwise directed by the court.

CIVIL CASE MANAGEMENT

7. No later than seven days before the initial case management or status conference, the parties shall file a Joint Case Management Statement in full compliance with the Court's Standing Order for All Judges of the Northern District of California governing "Contents of Joint Case Management Statement," available on the Court's website.

8. Parties may not continue a case management conference without court approval. Each party shall be represented in person at the Case Management Conference by counsel (or a party if in pro se), who shall (1) be prepared to address all of the matters referred to in the Northern District of California's standing order on Joint Case Management Statements; and (2) have full authority to enter stipulations and make admissions pursuant to that order. Permission for a party to attend by telephone may be granted, in the court's discretion, upon written request made with reasonable advance notice if the court determines that good cause exists to excuse personal attendance, and that personal attendance is not needed in order to have an effective conference. The facts establishing good cause must be set forth in the request.

9. All hearings and case management conferences are audio recorded. They are not necessarily reported by a court reporter. Audio recordings of case management conferences generally are uploaded to and available through ECF. Parties may request a copy of audio recordings or transcriptions by following the procedures set forth at <http://cand.uscourts.gov/transcripts>.

10. ECF Filings: All exhibits to motions and/or discovery disputes should be separately filed on ECF (for example, if the motion is Docket No. 30, and the declaration with 10 exhibits is Docket No. 31, Exhibit A would be filed as Docket No. 31-1, Exhibit B would be Docket No. 31-2, and so on). **All exhibits shall also be filed in a searchable OCR format where possible.**

11. Motions to File Under Seal: Parties are reminded that court proceedings are presumptively public, and no document shall be filed under seal without request for a court order that is narrowly tailored to cover only the document, the particular portion of the document, or category of documents for which good cause exists for filing under seal. If a party wishes to file a document under seal, that party shall first file an administrative motion to seal in accordance with Local Rule 79-5.

The parties need not file paper copies of the administrative motion to seal with the clerk's office. The parties only need to submit chambers copies of the administrative motion to seal and related filings. Chambers copies should include all material — both redacted and unredacted — so that the chambers staff does not have to re-assemble the whole brief or declaration, although chambers copies should clearly delineate which portions are confidential (via highlighting). Chambers copies with confidential materials will be handled like all other chambers copies of materials without special restriction, and will typically be recycled, not shredded. If the parties wish to dispose of documents filed under seal in some other way, they must expressly indicate as much in their sealing motion and make arrangements to pick up the documents upon disposition of the motion.

12. Litigants and lawyers may provide preferred pronouns by filing a letter or adding the pronouns in the name block on the pleadings.

CIVIL DISCOVERY

13. In order to respond to discovery disputes in a flexible, cost-effective and efficient manner, the court uses the following procedure. The parties shall not file formal discovery motions. Instead, as required by the federal and local rules, the parties shall first meet and confer to try to resolve their disagreements. The meet and confer session must **be in person or by telephone**, and may not be conducted by letter, e-mail, or fax. If disagreements remain, the parties shall file a joint letter **no later than five business days** after the meet and confer session, unless otherwise directed by the court. **Lead trial counsel for both parties must sign the letter**, which shall include an attestation that the parties met and conferred in person or by telephone regarding all issues prior to filing the letter. **The letter must also include a paragraph listing relevant case management deadlines**, including (1) the fact and expert discovery cut-off dates; (2) the last day to hear or file dispositive motions; (3) claim construction or class certification briefing deadlines and hearing dates; and (4) pretrial conference and trial dates. **Going issue-by-issue**, the joint letter shall describe each unresolved issue, summarize each party's position with appropriate legal authority, and **provide each party's final proposed compromise** before moving to the next issue. The joint letter shall not exceed **five** pages (12-point font or greater; margins no less than one inch) without leave of court. **Parties are expected to plan for and cooperate in preparing the joint letter so that each side has adequate time to address the arguments.** In the rare instance that a joint letter is not possible, each side may submit a letter not to exceed **two** pages, which shall include an explanation of why a joint letter was not possible. The parties shall submit one exhibit that sets forth each disputed discovery request in full, followed immediately by the objections and/or responses thereto. No other information shall be included in the exhibit. No other exhibits shall be submitted without prior court approval. The court will review the submission(s) and determine whether formal briefing or proceedings are necessary. **Discovery letter briefs must be e-filed under the Civil Events category of Motions and Related Filings > Motions - General > "Discovery Letter Brief".**

14. It is often efficient and beneficial for counsel to appear in person at discovery hearings. This provides the opportunity to engage counsel, where appropriate, in resolving aspects of the discovery dispute while remaining available to rule on disputes that counsel are not able to resolve themselves. **For this reason, the court expects counsel to appear in person.** Permission to attend by telephone may be granted upon advance written request if the court determines that good cause exists to excuse personal attendance, and that personal attendance is not needed in order to have an effective discovery hearing. The facts establishing good cause must be set forth in the request.

15. If parties believe a **protective order** is necessary, they shall, where practicable, use one of the model stipulated protective orders (available at <http://cand.uscourts.gov/model-protective-orders>). Parties shall file one of the following with their proposed protective order: (a) a declaration stating that the proposed order is identical to one of the model orders except for the addition of case-identifying information or the elimination of language denoted as optional; (b) a declaration explaining each modification to the model order, along with a redline version comparing the proposed protective order with the model order; or (c) a declaration explaining why use of one of the model orders is not practicable.

16. If a party withholds responsive information by claiming that it is privileged or otherwise protected from discovery, that party shall produce a **privilege log** as quickly as possible, **but no later than fourteen days after its disclosures or discovery responses are due**, unless the parties stipulate to or the Court sets another date. Privilege logs must be sufficiently detailed for the opposing party to assess whether the assertion of privilege is justified. Unless the parties agree to alternative logging methods, the log should include: (a) the title and description of the document, including number of pages or Bates-number range; (b) the subject matter addressed in the document; (c) the identity and position of its author(s); (d) the identity and position of all addressees and recipients; (e) the date the document was prepared and, if different, the date(s) on which it was sent to or shared with persons other than its author(s); and (f) the specific basis for the claim that the document is privileged or protected.

Communications involving trial counsel that post-date the filing of the complaint need not be placed on a privilege log. Failure to timely furnish a privilege log may be deemed a waiver of the privilege or protection.

SELF REPRESENTED (PRO SE) PARTIES

17. Parties representing themselves should visit the Quick Link titled “If You Don’t Have a Lawyer” on the Court’s homepage, <http://cand.uscourts.gov/proselitigants>. The link discusses the Court’s “Legal Help Center” for unrepresented parties, and provides addresses and contact information for the three branches, which are located in the San Francisco, Oakland and San Jose courthouses.

LAWYER DEVELOPMENT

18. The court strongly encourages parties to contribute to the development of the bar by permitting less experienced lawyers and lawyers from historically under-represented groups to argue motions, have a significant participatory role in settlement conferences, and examine witnesses at trial.

IT IS SO ORDERED.



DONNA M. RYU
United States Magistrate Judge

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Plaintiff,

v.

Defendant.

Case No. C-xx-xxxxxx (DMR)

**NOTICE OF SETTLEMENT
CONFERENCE AND SETTLEMENT
CONFERENCE ORDER (REV. 3/6/19)**

TO ALL PARTIES AND COUNSEL OF RECORD:

The above matter was referred to Magistrate Judge Donna M. Ryu for settlement purposes. You are hereby notified that a settlement conference is scheduled for __, at ____a.m., at the U.S. District Court, 1301 Clay Street, Oakland, California 94612. For courtroom number and floor information, please check the court's on-line calendar at <http://www.cand.uscourts.gov> on Friday, prior to the scheduled hearing date.

If all parties, counsel, and other mandatory attendees are **not** available on the above date, counsel shall notify the court in writing **within 3 business days**. The parties should be mindful of any time limits set by the judge to whom the case is assigned. **If written notice is not provided within 3 business days, the settlement conference date as stated above shall remain in effect.**

It is the responsibility of counsel to ensure that whatever formal or informal discovery is needed for all sides to evaluate the case for settlement purposes is completed by the date of the settlement conference.

A. Meet and Confer Requirement.

No later than **fourteen (14) calendar days before** the settlement conference and prior to the preparation of their Exchanged Settlement Conference Statements and Confidential Settlement Letters, counsel for the parties must meet and confer (in person or by phone) to discuss matters

1 pertinent to improving the prospects that the settlement negotiations will be productive. During
2 the meet and confer, counsel may address any subjects they feel are appropriate, but they **must**
3 discuss the following:

4 1. Who will attend the conference on behalf of each party, including counsel and
5 identification of the person(s) with full authority to make the final decision as to whether any
6 settlement offer is made, accepted, or rejected (e.g., either the party or another person(s) if full
7 authority does not rest with the party).

8 2. Which persons or entities must approve a proposed settlement agreement before it
9 can be executed, as well as the nature and duration of any such approval process.

10 3. Whether insurance is available to cover all or part of the claimed losses or to fund
11 all or part of any party's defense; whether tenders have been made to any insurance companies;
12 and if insurance is available, the name of and position held by each claims representative who will
13 be attending the settlement conference.

14 4. Whether it would be useful for settlement demands and/or offers to be made before
15 the settlement conference is convened.

16 5. Whether there are particular documents or other tangible things that should be
17 brought to the conference (e.g., to educate the settlement judge or to support or explain significant
18 contentions).

19 6. Any unusual issues or factors that could come into play in the settlement
20 negotiations or any especially sensitive matters that other counsel should be alerted to before the
21 conference.

22 **B. Lodged Settlement Conference Documents.**

23 **No later than ten (10) calendar days prior to the settlement conference**, each party
24 shall submit the following:

25 (1) an **Exchanged Settlement Conference Statement**; and

26 (2) a **Confidential Settlement Letter**.

27 **A hard copy of each** document shall be **LODGED (not filed)** with the U.S. District Court
28 Clerk's Office in **Oakland**, located at 1301 Clay Street, Suite 400S, 4th Floor, Oakland, California

94612. The documents shall be submitted in a sealed envelope addressed to Magistrate Judge Ryu and prominently marked "**SETTLEMENT CONFERENCE DOCUMENTS - DO NOT FILE.**"

In addition to the hard copy version, **an electronic copy** shall be submitted to **DMRsettlement@cand.uscourts.gov**.

1. Exchanged Settlement Conference Statements.

Counsel **shall serve** a copy of the Settlement Conference Statement on all parties. Furthermore, counsel are **strongly encouraged** prior to the settlement conference to share with their clients the contents of the Settlement Conference Statement(s) received from opposing counsel.

The Settlement Conference Statement shall not exceed ten (10) pages of text. Parties are encouraged to include as exhibits any key documents and deposition excerpts up to twenty (20) pages. The Settlement Conference Statement **shall include** the following:

- a. A brief statement of the facts of the case.
- b. A brief statement of the **principal** claims and defenses.
- c. A description of the **key** factual and legal issues that are in dispute and a plain and concise statement of the **specific** evidence relevant to their determination. Portions of any exhibits relied upon by the parties shall be referenced and highlighted.
- d. A summary of the proceedings to date and a description of any pending motions.
- e. The bases for any damages calculations and a description of any non-monetary relief sought or non-monetary components of settlement offers or demands.
- f. A description of each component of each party's most recently communicated settlement demand or offer (describing specifically any non-monetary terms that were demanded or offered).
- g. For each party, a list of the names, titles, and positions of all persons who will be attending the conference.
- h. Where the party is a governmental entity, a description of which persons or entities must approve a proposed settlement agreement before it can be executed, as well as the

1 nature and duration of that approval process.

2 **2. Confidential Settlement Letters.**

3 The Confidential Settlement Letter **shall not be served** upon other parties. The
4 Confidential Settlement Letter shall not exceed five (5) pages of text and **shall include** the
5 following:

6 a. Separately for each principal claim and defense, a forthright evaluation of
7 the strengths and weaknesses and likelihood that the party submitting the Confidential Letter will
8 prevail. Citations to any key legal authorities relied upon by the parties as part of this evaluation
9 shall be provided.

10 b. An estimate of the out-of-pocket expenses, attorneys' fees, and time: (a)
11 **spent to date** and (b) **to be expended** for further discovery, pretrial, and trial. If plaintiff seeks
12 attorneys' fees and costs, plaintiff's counsel shall be prepared at the conference to provide
13 sufficient information to enable the fee claim to be evaluated for purposes of settlement.

14 c. A history of past settlement discussions (without revealing communications
15 whose disclosure to a settlement judge is prohibited), a description of the principal obstacles
16 (factual, legal, or other) to reaching agreement, and the reason the parties' assessments of the
17 settlement value of the case differ.

18 d. A realistic settlement figure or terms (including any non-monetary terms)
19 that, given all the circumstances, the party submitting the Confidential Letter would consider
20 seriously.

21 e. Where the party is insured or is a governmental entity, any foreseeable
22 barriers to insurance coverage or approval of a proposed settlement, or special concerns that the
23 insurer or governmental entity might want addressed.

24 f. A brief discussion of any of the subjects identified in Section A of this
25 Order that might be significant in the settlement dynamic.

26 **C. Mandatory Personal Attendance.**

27 **Lead trial counsel** shall appear at the settlement conference with the **parties and with the**
28 **person(s) having full authority** to make the final decision as to whether any settlement offer is

made, accepted, or rejected (if full authority does not rest with the party). A person who needs to call another person not present before making, accepting, or rejecting any settlement offer does **not** have such full authority. If a party is a **governmental entity**, its governing body shall designate one of its members or a senior executive to appear at the settlement conference with authority to participate in the settlement conference and, if a tentative settlement agreement is reached, to recommend the agreement to the governmental entity for its approval. An **insured party** shall appear with a representative of the carrier with **full authority to negotiate up to the limits of coverage**.

Personal attendance is mandatory and will rarely be excused by the court, and then only upon a written request that is timely under the circumstances and that demonstrates extraordinary hardship. Personal attendance may be excused only upon written authorization from the court. If the court permits attendance by telephone, the person who is excused from personally appearing must be available to participate by telephone throughout the entire conference.

D. Duration and Content of Settlement Conference.

It is not unusual for settlement conferences to last three (3) or more hours. Parties and their representatives should be prepared to devote the entire day to the conference if necessary. Parties are encouraged to participate in the settlement conference and frankly discuss their case. Statements they make during the conference will not be admissible at trial in the event the case does not settle. The parties and their representatives should be prepared to discuss such issues as their settlement objectives; any impediments to settlement they perceive; whether they have enough information to discuss settlement and if not, what additional information is needed; and the possibility of a creative resolution of the dispute.

E. Continuances.

Any request to continue the settlement conference shall state the reason therefor and be submitted in writing as soon as possible after consultation with the opposing party but well in advance of the scheduled conference date. The request must demonstrate **a compelling reason for a continuance and shall state whether it is joined or opposed by the other party(ies)**. Submission of such request shall be **filed** with the court. **Parties must appear on the calendared**

1 **date unless the court issues an Order continuing the matter.**

2 If the date to which a continuance is sought would be past a deadline for holding the
3 settlement conference that was set by the judge to whom the case is assigned for trial, the party
4 seeking the continuance must secure permission from the trial judge to hold the settlement
5 conference during the proposed new time frame **before seeking the continuance from Judge**
6 **Ryu.** A writing evidencing the trial judge's extension of the deadline must accompany the party's
7 request to Judge Ryu for the continuance.

8 The parties shall immediately notify Judge Ryu's Courtroom Deputy, Ivy Garcia, at (510)
9 637-3639, if this case settles prior to the date set for the settlement conference.

10 Any failure to comply with the requirements of this Order may subject the parties and/or
11 counsel to sanctions.

12
13 **IT IS SO ORDERED.**

14 Dated:



15
16 DONNA M. RYU
United States Magistrate Judge

**NOTICE RE TELEPHONIC APPEARANCE PROCEDURES FOR
MAGISTRATE JUDGE DONNA M. RYU**

I. POLICY GOVERNING TELEPHONIC APPEARANCES

A party representative (or a party if *in pro se*) generally must appear in person for a hearing or case management conference. Permission to attend by telephone may be granted, in the Court's discretion, upon written request made at least two weeks in advance of the hearing if the Court determines that good cause exists to excuse personal attendance, and that personal attendance is not needed in order to have an effective hearing or conference. The facts establishing good cause must be set forth in the request. All telephonic appearances must be made through **CourtCall**, an independent conference call company, pursuant to the procedures set forth in Section II. If an individual schedules a telephonic appearance and then fails to respond to the call of a matter on calendar, the Court may pass the matter or may treat the failure to respond as a failure to appear. Scheduling simultaneous telephonic appearances in multiple courts does not excuse a failure to appear. Individuals making use of the conference call service are cautioned that they do so at their own risk. Hearings generally will not be rescheduled due to missed connections.

II. SCHEDULING A TELEPHONIC APPEARANCE.

By Telephone: Absent an emergency, telephone appearances may be arranged by calling **CourtCall at (866) 582-6878 at least three business days** prior to the hearing date.

III. PROCEDURE FOR TELEPHONIC APPEARANCE.

CourtCall will provide counsel with written confirmation of a telephonic appearance, and give counsel a number to call to make the telephonic appearance. It is counsel's responsibility to dial into the call not later than 10 minutes prior to the scheduled hearing.

CourtCall does not place a call to counsel.

You are responsible for making payment arrangements with CourtCall. If you do not timely call and connect with the CourtCall operator, you will be billed for the call and the hearing may proceed in your absence.

Telephonic appearances are connected directly with the courtroom's public address system and electronic recording equipment so that a normal record is produced. To ensure the quality of the record, the use of car phones, cellular phones, speakerphones, public telephone booths, or phones in other public places is prohibited except in the most extreme emergencies. Participants should be able to hear all parties without difficulty or echo.

At the time of your hearing, you may initially be in the listening mode in which case you will be able to hear the case before yours just as if you were in the courtroom. After your call is connected to the courtroom, the Judge will call the case, request appearances, and direct the manner in which the hearing proceeds. Each time you speak, you should identify yourself for the record. The court's teleconferencing system allows more than one speaker to be heard, so the Judge can interrupt a speaker to ask a question or redirect the discussion. When the Judge informs the participants that the hearing is completed, you may disconnect and the next case will be called.

Telephonic appearances by multiple participants are only possible when there is compliance with every procedural requirement. Sanctions may be imposed when there is any deviation from the required procedures or the Court determines that a person's conduct makes telephonic appearances inappropriate. Sanctions may include dropping a matter from calendar, continuing the hearing, proceeding in the absence of an unavailable participant, a monetary sanction, and/or a permanent prohibition against a person appearing telephonically.

Court Call Telephone Appearance Procedure

3/6/2019

**STANDING ORDER FOR ALL JUDGES
OF THE NORTHERN DISTRICT OF CALIFORNIA**

CONTENTS OF JOINT CASE MANAGEMENT STATEMENT

All judges of the Northern District of California require identical information in Joint Case Management Statements filed pursuant to Civil Local Rule 16-9. The parties must include the following information in their statement which, except in unusually complex cases, should not exceed ten pages:

1. Jurisdiction and Service: The basis for the court's subject matter jurisdiction over plaintiff's claims and defendant's counterclaims, whether any issues exist regarding personal jurisdiction or venue, whether any parties remain to be served, and, if any parties remain to be served, a proposed deadline for service.
2. Facts: A brief chronology of the facts and a statement of the principal factual issues in dispute.
3. Legal Issues: A brief statement, without extended legal argument, of the disputed points of law, including reference to specific statutes and decisions.
4. Motions: All prior and pending motions, their current status, and any anticipated motions.
5. Amendment of Pleadings: The extent to which parties, claims, or defenses are expected to be added or dismissed and a proposed deadline for amending the pleadings.
6. Evidence Preservation: A brief report certifying that the parties have reviewed the Guidelines Relating to the Discovery of Electronically Stored Information ("ESI Guidelines"), and confirming that the parties have met and conferred pursuant to Fed. R. Civ. P. 26(f) regarding reasonable and proportionate steps taken to preserve evidence relevant to the issues reasonably evident in this action. *See ESI Guidelines 2.01 and 2.02, and Checklist for ESI Meet and Confer.*
7. Disclosures: Whether there has been full and timely compliance with the initial disclosure requirements of Fed. R. Civ. P. 26, and a description of the disclosures made.
8. Discovery: Discovery taken to date, if any, the scope of anticipated discovery, any proposed limitations or modifications of the discovery rules, a brief report on whether the parties have considered entering into a stipulated e-discovery order, a proposed discovery plan pursuant to Fed. R. Civ. P. 26(f), and any identified discovery disputes.
9. Class Actions: If a class action, a proposal for how and when the class will be certified, and whether all attorneys of record for the parties have reviewed the Procedural Guidance for Class Action Settlements.
10. Related Cases: Any related cases or proceedings pending before another judge of this court, or before another court or administrative body.
11. Relief: All relief sought through complaint or counterclaim, including the amount of any damages sought and a description of the bases on which damages are calculated. In addition, any party from whom damages are sought must describe the bases on which it contends damages should be calculated if liability is established.

12. Settlement and ADR: Prospects for settlement, ADR efforts to date, and a specific ADR plan for the case, including compliance with ADR L.R. 3-5 and a description of key discovery or motions necessary to position the parties to negotiate a resolution.
13. Consent to Magistrate Judge For All Purposes: Whether **all** parties will consent to have a magistrate judge conduct all further proceedings including trial and entry of judgment. ___ Yes ___ No
14. Other References: Whether the case is suitable for reference to binding arbitration, a special master, or the Judicial Panel on Multidistrict Litigation.
15. Narrowing of Issues: Issues that can be narrowed by agreement or by motion, suggestions to expedite the presentation of evidence at trial (e.g., through summaries or stipulated facts), and any request to bifurcate issues, claims, or defenses.
16. Expedited Trial Procedure: Whether this is the type of case that can be handled under the Expedited Trial Procedure of General Order No. 64 Attachment A. If all parties agree, they shall instead of this Statement, file an executed Agreement for Expedited Trial and a Joint Expedited Case Management Statement, in accordance with General Order No. 64 Attachments B and D.
17. Scheduling: Proposed dates for designation of experts, discovery cutoff, hearing of dispositive motions, pretrial conference and trial.
18. Trial: Whether the case will be tried to a jury or to the court and the expected length of the trial.
19. Disclosure of Non-party Interested Entities or Persons: Whether each party has filed the "Certification of Interested Entities or Persons" required by Civil Local Rule 3-15. In addition, each party must restate in the case management statement the contents of its certification by identifying any persons, firms, partnerships, corporations (including parent corporations) or other entities known by the party to have either: (i) a financial interest in the subject matter in controversy or in a party to the proceeding; or (ii) any other kind of interest that could be substantially affected by the outcome of the proceeding. In any proposed class, collective, or representative action, the required disclosure includes any person or entity that is funding the prosecution of any claim or counterclaim.
20. Professional Conduct: Whether all attorneys of record for the parties have reviewed the Guidelines for Professional Conduct for the Northern District of California.
21. Such other matters as may facilitate the just, speedy and inexpensive disposition of this matter.

United States District Court Northern District of California

ECF Registration Information

Electronic Case Filing (ECF or “e-filing”) is mandatory for all civil cases in this court. Please refer to Civil Local Rule 5-1 for the Court’s rules pertaining to electronic filing. Effective August 19, 2013, e-filing of initiating documents (complaints; notices of removal) is allowed, but is not mandatory; all other documents must be e-filed in civil cases.

Parties who are representing themselves pro se (without attorney representation) are not required to e-file and, in fact, may e-file only with the permission of the assigned judge.

Please review and attend to the following important notes and tasks:

- Serve this ECF Registration Information Handout on all parties in the case along with the complaint or removal notice and the other documents generated by the court upon filing.
- If not already registered, each attorney in the case must register to become an e-filer at cand.uscourts.gov/ECF. Your ECF registration is valid for life in this district; please do not register more than once.

IMPORTANT NOTICE: by signing and submitting to the court a request for an ECF user id and password, you consent to entry of your email address into the court’s electronic service registry for electronic service on you of all e-filed papers, pursuant to rules 77 and 5(b)(2)(d) of the Federal Rules of Civil Procedure.

- If you are a party and do not have an attorney and would like to e-file in the case, please visit cand.uscourts.gov/ECF/proseregistration for instructions and information. Unless and until the assigned judge has given you permission to e-file, you are required to file and serve papers in hard copy (paper) form.
- Access dockets and documents using your PACER (Public Access to Court Electronic Records) account. If your firm already has a PACER account, please use that account. It is not necessary to have individual PACER accounts for each user in your office. To set up an account, visit: pacer.gov or call (800) 676-6856.

ECF interactive tutorials, instructions for e-filing and other information are available at: cand.uscourts.gov/ECF.

Filing Procedures (Oakland)

To supplement the local rules, the following guidelines have been provided to ensure that the filing process is accomplished with ease and accuracy. For additional information or assistance, please call the Clerk's Office during office hours.

1. Manually filed documents are filed in the Clerk's Office at the location of the chambers of the judge to whom the action has been assigned. We do not accept filings for cases assigned to judges or magistrate judges in the San Francisco or San Jose division, per Civil Local Rule 3-2(b)
2. This office will retain the original and one copy of most documents submitted. We will conform as many copies as you bring for your own use. Related cases require an extra copy for **each** related action designated.
3. The retained copy goes directly to the assigned Judge. Courtesy copies, or instructions for couriers to deliver a copy directly to chambers are inappropriate, unless you have been instructed to do so by court order.
4. To facilitate the file stamping process, each original document must be submitted on top of its copies. In other words, group like documents together, as opposed to a set of originals and separate sets of copies.
5. The case number must indicate whether it is a civil or criminal matter by the inclusion of **C** or **CR** at the beginning of the number. Miscellaneous and foreign judgment matters should also be indicated with initials **MISC** at the end of the case number. The case number must include the initials of the judge and/or magistrate judge.
6. Documents containing hearing dates should include the appropriate judge or magistrate judge involved in a particular matter or before whom an appearance is being made. This is especially important when submitting Settlement Conference Statements.
7. Documents are to be stapled or acco-fastened at the top. Backings, bindings and covers are not required. Two holes punched at the top of the original document will facilitate processing.
8. Appropriately sized, stamped, self-addressed return envelopes are to be included with proposed orders or when filing documents by mail.
9. Proofs of service should be attached to the back of documents. If submitted separately, you must attach a pleading page to the front of the document showing case number and case caption.
10. There are no filing fees once a case has been opened, aside from the fee for a Notice of Appeal.
11. New cases must be accompanied by a completed and signed Civil Cover Sheet, the filing fee or fee waiver request form and an original plus **two** copies of the complaint and any other documents. For Intellectual Property cases, please provide an original plus **three** copies of the complaint. Present new cases for filing before 3:30 p.m.
12. Copies of forms may be obtained at no charge. They may be picked up in person from the Clerk's Office or with a written request accompanied by an appropriate sized, stamped, self-addressed envelope for return. In addition, copies of the Local Rules may be obtained, free of charge, in the Clerk's Office or by sending a written request, along with a self-addressed, 10" x 14" return envelope, stamped with \$7.50 postage to: Clerk, U.S. District Court, 1301 Clay Street, Suite 400South, Oakland, CA 94612.
13. Two computer terminals that allow public access to case dockets and information regarding files at the Federal Records Center (FRC) are located in the reception area of the Clerk's Office. Written instructions are posted by the terminals. Outside of the Clerk's Office, electronic access to dockets is available through PACER (www.pacer.gov). To obtain information or to register call 1-800-676-6851.
14. A file viewing area is located adjacent to the reception area. Files may be viewed in this area after signing the log sheet and presenting identification. Under no circumstances are files to be removed from the viewing room. (Hours for Oakland are 9:00 a.m. to 4:00 p.m.)

15. The Clerk's Office can only accept payment by exact change, check or credit card, made payable to Clerk, U.S. District Court. No change can be made for fees or the public copy machine.
 16. A coin/card operated copy machine is located in the file viewing area for public use, at twenty-five cents (\$.25) per page. Personal copiers may be brought in at anytime during normal operating hours.
 17. Drop Boxes for filing are available when the Clerk's Office is closed.
-

UNITED STATES DISTRICT COURT

for the
Northern District of California_____
Plaintiff

v.

Defendant)))))
Civil Action No.

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF A SUMMONS

To: _____
(Name of the defendant or - if the defendant is a corporation, partnership, or association - an officer or agent authorized to receive service)**Why are you getting this?**

A lawsuit has been filed against you, or the entity you represent, in this court under the number shown above. A copy of the complaint is attached.

This is not a summons, or an official notice from the court. It is a request that, to avoid expenses, you waive formal service of a summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within _____ days (give at least 30 days, or at least 60 days if the defendant is outside any judicial district of the United States) from the date shown below, which is the date this notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint (or 90 days if this notice is sent to you outside any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will arrange to have the summons and complaint served on you. And I will ask the court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: _____

*Signature of the attorney or unrepresented party*_____
*Printed name*_____
*Address*_____
*E-mail address*_____
Telephone number

UNITED STATES DISTRICT COURT

for the
Northern District of California_____
Plaintiff

v.

*Defendant*_____
Civil Action No.

WAIVER OF THE SERVICE OF SUMMONS

To: _____
(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from _____, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: _____

*Signature of the attorney or unrepresented party*_____
*Printed name of party waiving service of summons*_____
*Printed name*_____
*Address*_____
*E-mail address*_____
Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

Exhibit N

AO 398 (Rev. 01/09) Notice of a Lawsuit and Request to Waive Service of a Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual,

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF A SUMMONS

To: Sarah Michelle Reichwein, aka Isis Agora Lovecruft

(Name of the defendant or - if the defendant is a corporation, partnership, or association - an officer or agent authorized to receive service)

Why are you getting this?

A lawsuit has been filed against you, or the entity you represent, in this court under the number shown above. A copy of the complaint is attached.

This is not a summons, or an official notice from the court. It is a request that, to avoid expenses, you waive formal service of a summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within 30 days (give at least 30 days, or at least 60 days if the defendant is outside any judicial district of the United States) from the date shown below, which is the date this notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

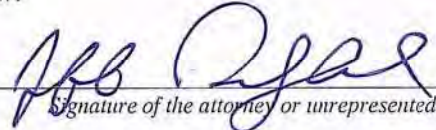
If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint (or 90 days if this notice is sent to you outside any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will arrange to have the summons and complaint served on you. And I will ask the court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: 04/16/2019



Signature of the attorney or unrepresented party

Jeffrey M. Rosenfeld

Printed name

150 Post St., Suite 520
San Francisco, CA 94108

Address

jeff@KRInternetLaw.com

E-mail address

415-955-1155

Telephone number

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (Bar No. 226112)

Jeffrey M. Rosenfeld (Bar No. 222187)

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karl@KRInternetLaw.com

jeff@KRInternetLaw.com

liana@KRInternetLaw.com

Attorneys for Plaintiff Peter Todd

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PETER TODD, an individual,

Plaintiff,

v.

**SARAH MICHELLE REICHWEIN aka ISIS
AGORA LOVECRUFT**, an individual,

Defendant.

Case No. 3:19-cv-01751

**COMPLAINT FOR INJUNCTIVE
RELIEF AND DAMAGES**

DEMAND FOR JURY TRIAL



1 Plaintiff Peter Todd, an individual, by and through his attorneys of record, states
2 and alleges as follows:

3 INTRODUCTION

4 1. Plaintiff Peter Todd ("Plaintiff" or "Todd") is a former Bitcoin Core developer
5 and an applied cryptography consultant. Todd regularly speaks at conferences
6 throughout the world regarding his work in cryptography.

7 2. Defendant Sarah Michelle Reichwein ("Defendant"), who goes by the
8 fictitious name Isis Agora Lovecraft, is a self-described "anarchist; hacker; once-upon-a-
9 time theoretical physicist." Like Todd, Defendant regularly attends cryptography
10 conferences.

11 3. Todd and Defendant are acquaintances, having interacted on multiple
12 occasions at cryptography conferences and social events.

13 4. In or around June 2016, Defendant publicly accused third party Jacob
14 Appelbaum of sexually assaulting her.

15 5. When Todd did not publicly condemn Appelbaum, Defendant published
16 false statements about Todd on her Twitter profile accusing Todd of rape and sexual
17 assault.

18 6. Defendant's statements are false as Todd has never raped or sexually
19 assaulted anyone.

20 7. Defendant's statements accusing Todd of rape and sexual assault remain
21 publicly viewable on Defendant's Twitter profile.

22 8. Todd has been harmed and continues to be harmed by Defendant's
23 defamatory statements.

24 JURISDICTION AND VENUE

25 9. This Court has subject matter jurisdiction over this action pursuant to 28
26 U.S.C. §1332. Plaintiff Peter Todd is a citizen of a foreign state, namely Canada, and has
27 not been admitted for permanent residence in the United States. On information and
28 belief, Defendant is a citizen of California in that she is a citizen of the U.S. and a

1 domiciliary of California. The matter in controversy exceeds the sum or value of \$75,000,
2 exclusive of interest and costs.

3 10. Venue is proper pursuant to 28 U.S.C. §1391 because, on information and
4 belief, Defendant resides in this district.

5 11. This Court has personal jurisdiction over Defendant, because, on
6 information and belief, Defendant resides in California and has substantial, continuous,
7 and systematic contacts with California.

8 INTRADISTRICT ASSIGNMENT

9 12. Because a substantial part of the events which give rise to Plaintiff's claim
10 occurred in Alameda County, pursuant to Local Civil Rule 3-2, this action should be
11 assigned to the San Francisco or Oakland Division.

12 PARTIES

13 13. Plaintiff Peter Todd is an individual and a citizen of Canada, residing in
14 Ontario, Canada.

15 14. On information and belief, Defendant Sarah Michelle Reichwein, who goes
16 by the fictitious name Isis Agora Lovecraft, is an individual, a U.S. citizen, and a
17 domiciliary of California.

18 FACTUAL ALLEGATIONS

19 15. Todd is a Bitcoin enthusiast and expert, consultant, and a leading developer
20 of cryptocurrency and blockchain software.

21 16. Todd is highly-regarded in the cryptography and cryptocurrency sectors for
22 his expertise in the security properties of the Bitcoin network and other decentralized
23 technologies.

24 17. Given his standing in the cryptography and cryptocurrency sectors, Todd is
25 regularly invited to speak at cryptography conferences throughout the world.

26 18. Additionally, Todd provides professional consulting services in
27 cryptography and cryptocurrency, for which he receives a premium in compensation
28 based on his knowledge and experience.



1 19. Todd has developed a large online following, and he regularly posts to his
2 Twitter profile under the handle @peterktodd, where he has numerous followers in the
3 cryptography and cryptocurrency sectors.

4 20. Todd's reputation, including his online reputation, are important aspects of
5 his standing in the cryptography community and his ability to maintain his consulting
6 profession.

7 21. Defendant is a self-described "anarchist; hacker; once-upon-a-time
8 theoretical physicist."

9 22. Defendant previously worked for The Tor Project, Inc., the goal of which is
10 to provide a way of using the Internet with as much privacy as possible, including by
11 routing Internet traffic through multiple servers and encrypting it each step of the way.

12 23. Like Todd, Defendant regularly attends cryptography conferences.

13 24. Todd initially met Defendant at the Summer 2014 Tor Dev Meeting, a
14 conference regarding the anonymizing software Tor.

15 25. Defendant disclosed her name to Todd as "Isis Agora Lovecraft." Todd
16 recognized the name as a pseudonym, as the use of pseudonyms is a common practice
17 in the cryptography community. Todd only discovered Defendant's actual name right
18 before filing this Complaint, after he engaged a private investigator to find that information
19 for purposes of bringing this lawsuit.

20 26. Between 2014 and 2016, Todd and Defendant had intermittent in-person
21 contact when they attended cryptography conferences.

22 27. Additionally, between 2014 and 2016, Todd and Defendant spent time
23 together socially on a few occasions.

24 28. Todd and Defendant also engaged in semi-regular online communications,
25 including via Twitter and Pond, an encrypted messaging application.

26 29. On or around June 15, 2016, Defendant publicly published on her Twitter
27 profile that third party Jacob Appelbaum had sexually assaulted her. Appelbaum is a
28 cryptography expert and was a core member of the Tor Project.



1 30. Initially, Todd published statements to Defendant commending her on her
2 bravery and denouncing sexual violence. Defendant reflected her approval of Todd's
3 statements, liking one of Todd's Twitter comments.

4 31. In August 2016, Todd publicly stated that he did not know what was true
5 regarding Defendant's and others' allegations against Appelbaum.

6 32. Around that same time, Defendant blocked Todd from viewing her Twitter
7 profile.

8 33. In May 2017, Todd communicated with Defendant through Github, a
9 professional platform designed for public software development. More specifically, Todd
10 requested more information from Defendant regarding a software programming issue,
11 namely, "how the callee is supposed to ensure that the bytes represent a valid
12 CompressedEdwardsY."


13 34. In response to Todd's request, Defendant published the following
14 statement:

15 "First things first: @petertodd, you've publicly, repetitively defended a man
16 who raped me and several other people, and disparaged the victims who
17 were brave enough to come forward with their stories. **Do not speak to**
18 **me. Do not use work as an excuse to speak to me. Do not use**
19 **cryptography as an excuse to speak to me.**"

20 (emphasis in original).

21 35. Thereafter, Todd did not initiate any contact with Defendant, either in person
22 or electronically.

23 36. On February 5, 2019, Defendant published the following statement on her
24 Twitter profile at <<https://twitter.com/isislovecruft/status/1093033203219148800>>:

25 "This is not even touching upon the stories of the rape and assault survivors
26 of you and @petertodd and @ioerror and you all have been seen to behave
27 conveniently alike and seen to dutifully protect one another ."

28 37. On February 8, 2019, Defendant published the following statement on her



1 Twitter profile at <<https://twitter.com/isislovecruft/status/1094091846047985666>> as a
2 follow up to her February 5, 2019 statement:

3 "i love watching the men in my industry who've sexually abused me and
4 many others squirm as I take them out one by one while they nervously
5 await their turn [¶] hahahahahahahaha eat goat dung you epoxy brained
6 cowards."

7 38. On February 20, 2019, Defendant published the following statement on her
8 Twitter profile at <<https://twitter.com/isislovecruft/status/1098270385148022784>>:

9 "Nadim Kobeissi is a serial rapist and abuser who defends other rapists
10 including Jacob Appelbaum and Peter Todd and in 2012 he grabbed my
11 face and force kissed me at a conference and i absolutely believe the
12 multiple survivors i've personally spoken with since then."

13 39. On February 20, 2019, Defendant published the following statement on her
14 Twitter profile at <<https://twitter.com/isislovecruft/status/1098280935353606144>>:

15 "yes, similar to Nadim, i personally have a story about Peter Todd and i've
16 personally spoken with survivors with absolutely awful and horrifying reports
17 who are terrified of him and of coming forward (rightly so) [¶] i however am
18 not afraid and shitty dudes are going down"

19 (the "Statement(s)").

20 40. The Statements contain and comprise false assertions of fact.

21 41. Contrary to the Statements, Todd has not raped Defendant or anybody else.

22 42. Contrary to the Statements, Todd has not sexually assaulted or otherwise
23 assaulted Defendant or anybody else.

24 43. Defendant's Twitter profile has over 20,000 followers.

25 44. Numerous people have viewed Defendant's Statements, and numerous
26 people have publicly commented on Defendant's Statements.

27 45. Defendant knew that her Statements were false when she made them
28 because Defendant knew that Todd had never raped her or sexually abused her.



1 Alternatively or additionally, Defendant acted in reckless disregard of the falsity of her
 2 Statements when she published them because the Statements falsely represent that
 3 Todd engaged in the most serious of misconduct, because Defendant had no credible
 4 evidence supporting her Statements when she published them, and because Defendant's
 5 social history with Todd contradicted the Statements.

6 46. As of the filing of this Complaint, the Statements remain publicly viewable
 7 on Defendant's Twitter profile.

8 47. Todd has been harmed by Defendant's Statements, including shame,
 9 embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
 10 reputation among his friends, peers, and professional community.

11 48. Additionally, and on information and belief, Todd has lost business and
 12 professional opportunities, including conference speakerships, because of Defendant's
 13 Statements.

14 **FIRST CAUSE OF ACTION**
 15 **(Defamation Under California Law)**

16 49. Todd repeats and incorporates by reference the allegations in Paragraphs
 17 1–48 above.

18 50. Todd is a private figure in that he has not voluntarily injected himself into a
 19 public controversy, and he has not achieved fame that reaches widely and pervasively
 20 throughout society.

21 51. Defendant published the defamatory Statements about Todd in at least the
 22 four Twitter posts identified herein and dated February 5, 2019, February 8, 2019, and
 23 February 20, 2019 (2).

24 52. Numerous people have viewed the Statements on Defendant's Twitter
 25 profile.

26 53. The Statements contain false assertions of fact, including that Todd raped
 27 and/or sexually assaulted Defendant and/or other people.

28 54. The Statements are false in that Todd has never raped or sexually



1 assaulted Defendant or any other person.

2 55. Defendant acted with malice when she published the defamatory
3 Statements. To wit, Defendant knew that her defamatory Statements were false when
4 she made them because Defendant knew the true state of affairs relating to Todd. In the
5 alternative, Defendant acted recklessly regarding the falsity of her Statements where the
6 Statements alleged that Todd engaged in the most serious of misconduct, where
7 Defendant had no credible evidence supporting her Statements, and where Defendant's
8 social history with Todd contradicted the Statements.

9 56. Defendant acted without any privilege when she published the defamatory
10 Statements.

11 57. The defamatory Statements constitute defamation per se because the
12 Statements: a) falsely charge Todd with committing illegal acts (i.e., rape; sexual assault),
13 b) contain charges by implication from the language employed such that the reader would
14 understand the defamatory meaning without the necessity of knowing extrinsic
15 explanatory matter, and c) by natural consequence would cause Todd actual damages.

16 58. On information and belief, Defendant published the defamatory
17 Statements willfully and maliciously with the intent to harm Todd.

18 59. As a result of Defendant's defamatory Statements, Todd has suffered
19 shame, embarrassment, hurt feelings, anxiety, mortification, embarrassment, and loss or
20 reputation among his friends, peers, and in his professional community.

21 60. Additionally, on information and belief, Todd has lost professional
22 opportunities, including conference speakerships, because of Defendant's Statements.

23 61. Defendant's defamatory Statements remain viewable on her public Twitter
24 profile as of the filing of this Complaint and continue to cause harm to Todd that cannot
25 be addressed by monetary damages alone.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff Peter Todd respectfully requests that the Court enter
28 judgment in favor of Plaintiff and against Defendant and award the following relief to



1 Plaintiff and against Defendant:

2 1. A permanent injunction requiring Defendant to remove defamatory
3 publications she has made about Plaintiff;

4 2. An award of damages to Plaintiff and against Defendant in an amount to be
5 proved at trial, comprising the following:

6 a. Compensatory damages under California law, including California
7 Civil Code section 3281;

8 b. Punitive damages pursuant to California Civil Code section 3294;

9 c. Plaintiff's costs of suit;

10 d. Pre-judgment interest to the extent allowed by law; and

11 3. Such other and additional relief as the Court deems just and proper.

12
13 Respectfully Submitted,

14 DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

15
16 By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

17
18 Attorneys for Plaintiff Peter Todd

KRONENBERGER ROSENFELD
150 Post Street, Suite 520, San Francisco, CA 94108



DEMAND FOR JURY TRIAL

Plaintiff, by and through his undersigned counsel, hereby demands a trial by jury for all questions of fact that can be decided by a jury in the above-entitled action.

Respectfully Submitted,

DATED: April 3, 2019

KRONENBERGER ROSENFELD, LLP

By: s/Jeffrey M. Rosenfeld
Jeffrey M. Rosenfeld

Attorneys for Plaintiff Peter Todd

KRONENBERGER ROSENFELD

150 Post Street, Suite 520, San Francisco, CA 94108



AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual, .

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

WAIVER OF THE SERVICE OF SUMMONS

To: Jeffrey M. Rosenfeld

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 04/16/2019, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: _____

Signature of the attorney or unrepresented party_____
Printed name of party waiving service of summons_____
Printed name_____
Address_____
E-mail address_____
Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Northern District of California

Peter Todd, an individual,

Plaintiff

v.

Sarah Michelle Reichwein, an individual,

Defendant

Civil Action No. 4:19-cv-01751-DMR

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(Name of the plaintiff's attorney or unrepresented plaintiff)

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Date: _____

*Signature of the attorney or unrepresented party**Printed name of party waiving service of summons**Printed name**Address**E-mail address**Telephone number*

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

Exhibit O

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

SAN FRANCISCO, CA 94114

0052 07

Certified Mail Fee	\$3.50
Extra Services & Fees (check box, add fee as appropriate)	\$2.80
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$2.35
Total Postage and Fees	\$8.65

Sent To Sarah Michelle Reichwein
Street an aka Isis Agora Lovecraft
City, State 2261 Market St. Ste. 325
 San Francisco, CA 94114-1600

PS Form 3800, April 2013 PSN 7530-02-000-9047 See Reverse for Instructions

Exhibit P

Exhibit Q

ZACHARY FECHHEIMER

2005 Lyon Street, San Francisco, California 94115
Office (415) 885-5918
Fax (415) 885-0685
E-mail zafechhe@gmail.com

May 3, 2019

Jeffrey M. Rosenfeld
KRONENBERGER ROSENFELD, LLP
150 Post Street, Suite 520
San Francisco, CA 94108

Re.: ISIS AGORA LOVECRUFT

REPORT OF INVESTIGATION

In March of 2019, my private investigation firm was engaged by plaintiff's counsel in the case of Peter Todd v. Sarah Michelle Reichwein aka Isis Agora Lovecruft, pending in the **United States District Court for the Northern District of California** (Case No. 4:19-cv-01751-DMR), to research and provide the actual name of the person using the pseudonym Isis Agora Lovecruft along with Lovecruft's residential address.

After that engagement, my firm used commercial data sources and online search engines to determine that Isis Agora Lovecruft was believed to be an alias used by a person named **Sarah Michelle Reichwein**.

Commercial data sources and property databases were used to identify the addresses most recently used by Sarah Reichwein who was born on June 12, 1989. The addresses include the following:

The address at 2261 Market Street, San Francisco, California 94114 has been reportedly used by Sarah Reichwein since July of 2018. Investigation revealed that this is a commercial address and post office center called Mail Access.

The address at 1389 Jefferson Street, Unit C501, Oakland, California 94612 is part of an apartment complex called Domain Oakland. Counsel advised that service had already been attempted at this address without success.

Commercial data sources and property databases were used to identify the parents of Sarah Reichwein as REDACTED who own and are believed to live at REDACTED. There is a homeowner's exemption filed against this property.

Jeffrey M. Rosenfeld
May 3, 2019
Re.: ISIS AGORA LOVECRUFT
Page 2

My firm provided an initial report to plaintiff's counsel on March 29, 2019.

In April of 2019, my private investigation firm was re-engaged by plaintiff's counsel to identify possible addresses where Sarah Reichwein is currently residing. I examined several sources of information for potential addresses for Sarah Reichwein. I also examined several sources of information for potential addresses for Sarah Reichwein's known personal companions in San Francisco, namely, Nicole Aptekar and Henry de Valence.

The blog of Isis Agora Lovecraft and other online news accounts were also reviewed. A search was made for any additional and publicly-viewable social media.

Commercial data sources were used to identify Nicole J. Aptekar. One of the sources identified the address at 609 Precita Avenue, San Francisco, California 94110 as the one most recently used by Aptekar. Counsel advised that they had been unsuccessful locating either Aptekar or Sarah Reichwein at this address.

Inquiries were made to the San Francisco Department of Elections to identify the address at [REDACTED] San Francisco, California 94103. Inquiries were also made to Google Maps to further study this address. Online inquiries were made to the website and available social media of Nicole Aptekar. This address may be used as an art studio by Nicole Aptekar.

These addresses were provided to counsel along with domain registration information about the website of Nicole Aptekar.

Commercial data sources were used to identify Henry de Valence. The only address listed for him by various sources is part of a commercial postal service at [REDACTED] [REDACTED] San Francisco, California 94114.

Online search engines were used to discover available social media and the domain registration for his web address. Inquiries to these sites failed to reveal any additional information about his whereabouts.

My firm provided a supplemental investigative report to plaintiff's counsel on April 24, 2019.

Other than the addresses identified in the reports to plaintiff's counsel, my firm has not been able to identify any viable, current residential addresses for Sarah Reichwein.

The above-described work took more than six hours and has been or will be billed, along with database expenses, at the rate of \$400 per hour.

ZACHARY FECHHEIMER

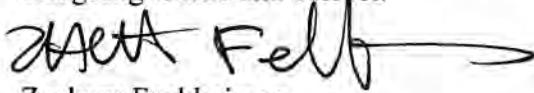
Jeffrey M. Rosenfeld

May 3, 2019

Re.: ISIS AGORA LOVECRUFT

Page 3

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Zachary Fechheimer", with a long horizontal flourish extending to the right.

Zachary Fechheimer

May 3, 2019

ZACHARY FECHHEIMER